



# Air Pollution Control Division

## Small Business Assistance Program

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# Inspector Checklists

## For Chromium electroplating and Anodizing

Chromium Electroplating and Chromium Anodizing  
Regulation Number 8, Part E  
Incorporating by Reference:  
40 C.F.R. Part 63, Subpart N

Developed by:  
Small Business Assistance Program  
Stationary Sources Program  
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## INSPECTOR CHECKLIST, PRIOR TO INSPECTION

Applicable regulation: Chromium NESHAP at 40 C.F.R. Part 60, Subpart N.

There are several types of chromium electroplating and anodizing tanks. It is important for an Inspector to know which type of tank(s) s/he will be inspecting at the facility. Therefore, the Inspector should answer the following questions prior to the inspection of any chromium electroplating or anodizing tank(s). The answers will determine which type of tank(s) will be at the facility and which inspection checklist(s) must be reviewed prior to the inspection and brought to use during the inspection.

1.0 Based on Division records and the table below, determine the number of chromium electroplating and anodizing tanks operating at the facility. If the necessary information is not available from Division records, the Inspector should contact the owner or operator of the source prior to the inspection and request information to determine the function(s) and process parameters of each tank.

- Hard chromium electroplating  
 Decorative chromium electroplating  
 Chromium anodizing

Type of Operation	Functions	Process Parameters
Hard chromium electroplating	Provides a surface with functional properties such as wear resistance, low coefficient of friction, hardness, and corrosion resistance	<u>Federal specifications:</u> Plate thickness 1.3 to 760 microns Current density 150 to 600 A/ft <sup>2</sup> Plating time 20 minutes to 36 hours <u>Other parameters:</u> Chromic acid concentration 30 to 50 oz/gal Sulfuric acid concentration 0.3 to 0.5 oz/gal Solution temperature 120 to 150 °F
Decorative chromium electroplating	Provides a bright surface with wear and tarnish resistance	<u>Federal specifications:</u> Plate thickness 0.003 to 2.5 microns (chromic acid bath) or 0.13 to 25 microns (trivalent chromium bath) Current density 50 to 220 A/ft <sup>2</sup> Plating time 0.5 to 5 minutes <u>Other parameters:</u> Chromic acid concentration 30 to 50 oz/gal Sulfuric acid concentration 0.3 to 0.5 oz/gal Solution temperature 100 to 115 °F
Chromium anodizing	Provides corrosion resistance or electrical insulation	<u>Federal specifications:</u> Chromic acid concentrations of 6.67 to 13.3 oz/gal <u>Other parameters:</u> Film thickness 0.02 to 0.05 microns Current density 144 to 720 A/ft <sup>2</sup> Anodizing time 30 to 60 minutes Solution temperature 90 to 95 °F pH 0.5 to 0.85 Voltage 20 to 40 volts

2.0 If a facility's operations do not fall exactly within the function(s) and parameters of one of the types of chromium electroplating or anodizing sources, the Inspector must determine which type the operation should be considered. To make such a determination, the Inspector can consider the purpose for which the chrome is being applied, whether a hexavalent or trivalent solution is used, plate thickness, plating time, plate density, chromic acid concentrations, whether sulfuric acid is used, and temperature of the solution. The Inspector and the Division should determine together whether the source is a hard chromium electroplating, decorative chromium electroplating, or chromium anodizing source.

3.0 If a tank fits within the function(s) and parameters of one of the types of chromium electroplating or anodizing sources, the Inspector must then determine whether the source may be exempt. The source is exempt if it is a:

\_\_\_\_\_ Research or laboratory operation:

\_\_\_\_\_ primary purpose of research and development of new processes and products

\_\_\_\_\_ operations must be conducted under close supervision of technically trained personnel

\_\_\_\_\_ operation cannot be involved manufacture products for commercial sale, except in a de minimis/minor manner

\_\_\_\_\_ Process tanks in which neither chromium electroplating nor chromium anodizing occurs (i.e. rinse, etching, cleaning)

\_\_\_\_\_ Process tanks that contain a chromium solution but in which no electrolytic process occurs (i.e. chrome conversion coating tank where no electrical current is applied)

After determining which type(s) of tank(s) will be at the facility, review the Inspector's Guidance Manual for Inspecting: Chromium Electroplating and Anodizing Tanks and make a copy of the Inspector On-Site Checklist for each type of tank at the facility.

INSPECTOR CHECKLIST, CHROMIUM ANODIZING

Applicable regulation: Chromium NESHAP at 40 C.F.R. Part 60, Subpart N.

The Inspector must complete one checklist for each source or tank inspected.

Tank Number: \_\_\_\_\_

Date Inspected: \_\_\_\_\_

1.0 Compliance Date: the date by which a source must comply with the Chromium NESHAP depends on whether the source is existing or new/reconstructed.

	<b>Compliance Date</b>
Existing	September 19, 2014
New/reconstruction with initial startup after September 19, 2012	Immediately upon startup
Existing area source that becomes major	Immediately
New area source (after February 8, 2012) that becomes major	Immediately
Small facility that becomes large	Within 1 year of becoming major

This source had an initial startup date of \_\_\_\_\_

This is a (existing, new, reconstructed) source \_\_\_\_\_

This source must be in compliance as of \_\_\_\_\_

This source was in compliance on \_\_\_\_\_ OR

This source is not in compliance because \_\_\_\_\_

2.0 Facility is a Major or Area source: the owner or operator must have records which enable the Inspector to determine a source's potential to emit chromium.

\_\_\_\_\_ Major source if has the potential to emit ten tons per year of any one hazardous air pollutant (HAP) or twenty five tons per year of any combination of HAPs

\_\_\_\_\_ Area source if not a major source

\_\_\_\_\_ Major source if an area source increases the potential to emit above ten tons per year of any one HAP or twenty five tons per year of any combination of HAPs

3.0 Type of Air Pollution Control Device: the owner or operator should have documentation available on the control device(s) utilized and should demonstrate that the device(s) is functioning properly.

Add-on air pollution control devices:

- Composite mesh-pad system (CMP)
- Packed bed scrubber (PBS)
- CMP/PBS system
- Fiber-bed mist eliminator
- Other \_\_\_\_\_ (need Division or EPA approved documentation)

Chemical fume suppressant air pollution control devices:

- Foam blanket
- Wetting agent
- Other \_\_\_\_\_ (need Division or EPA approved documentation)

If using both an add-on and fume suppressant air pollution control device:

Type of add-on device(s): \_\_\_\_\_

Type of fume suppressant(s): \_\_\_\_\_

4.0 Number of Tanks Attached to the Same Air Pollution Control Device:

- Single tank attached to one control device
- Multiple tanks attached to one control device
  - Same operation performed at each tank
  - Same emission limit for each tank
  - Control device controls sources that are not chromium electroplating or anodizing tanks

5.0 Emission Limits: using the information from sections 1.0 and 4.0, answer:

The emission limit for this source, as determined by Tables 1 and 2 (pages 14 and 15) is

\_\_\_\_\_

Describe whether the source met the emission limits by the required compliance date

\_\_\_\_\_

If the source failed to meet the required emission limits by the compliance date, explain why

\_\_\_\_\_

\_\_\_\_\_

6.0 Operation and Maintenance (O&M) Plan:

- O&M plan is kept on record and available upon inspection, for the life of the affected source or until the source is no longer subject to the Chromium NESHAP

\_\_\_\_\_ The owner or operator, upon revision of the O&M plan, kept previous versions for a period of five years after each revision

\_\_\_\_\_ O&M plan is incorporated by reference into the facility's operating permit

O&M plan for this facility (yes/no):

\_\_\_\_\_ specifies the operating and maintenance criteria for the affected source

\_\_\_\_\_ specifies the housekeeping procedures (Table 4, page 19)

\_\_\_\_\_ specifies the add-on air pollution control device, if used to comply with the emission requirements

\_\_\_\_\_ specifies the process and control system monitoring equipment

\_\_\_\_\_ includes a standardized checklist to document the operation and maintenance of the air pollution control device(s) and process and control system monitoring equipment

\_\_\_\_\_ specifies procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur

\_\_\_\_\_ includes a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions

If the facility utilizes any add-on air pollution control devices:

\_\_\_\_\_ the O&M plan incorporates operation and maintenance practices for any add-on air pollution control device or monitoring equipment identified in Table 3 (page 17)

List the applicable operation and maintenance practices for the add-on air pollution control device(s) uses and whether the operator has complied:

Add-on Air Pollution Control Device	Operation and Maintenance Practice	Compliance (yes/no)
1.	a. b. c. d.	a. b. c. d.
2.	a. b. c. d.	a. b. c. d.
3.	a. b. c. d.	a. b. c. d.

\_\_\_\_\_ if the specific equipment used is not identified in Table 3, the O&M plan shall incorporate proposed operation and maintenance practices which must be submitted to the Division and the EPA

The owner or operator operates and maintains all of the following in a manner consistent with “good air pollution control practices,” including quarterly inspections (yes/no):

- \_\_\_\_\_ affected sources and ductwork of the sources
- \_\_\_\_\_ associated control devices
- \_\_\_\_\_ monitoring equipment

The following documentation was provided to establish whether the owner or operator properly maintained the source in a manner consistent with “good air pollution control practices” (yes/no):

- \_\_\_\_\_ monitoring results
- \_\_\_\_\_ review of the O&M plan, procedures, and records
- \_\_\_\_\_ inspection of the source
- \_\_\_\_\_ other \_\_\_\_\_

O&M plan does not meet the requirements, revisions must be made:

- \_\_\_\_\_ does not address a malfunction that has occurred
- \_\_\_\_\_ fails to provide for the operation of the affected source, the air pollution control technique, or the control system and process monitoring equipment during a malfunction in a manner consistent with “good air pollution control practices”
- \_\_\_\_\_ does not provide adequate procedures for correcting malfunctions

Has a malfunction occurred? \_\_\_\_\_

Did the O&M plan fail to or inadequately address the malfunction? \_\_\_\_\_  
If yes, explain \_\_\_\_\_

If the O&M plan failed to or inadequately addressed the malfunction, did the owner or operator revise the O&M plan within forty five days after the event?

\_\_\_\_\_ If no, explain \_\_\_\_\_

If yes, does the revised O&M plan include:

- \_\_\_\_\_ procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunctions
- \_\_\_\_\_ a program for corrective actions for such events

Did the owner or operator take actions inconsistent with the procedures specified in the O&M plan during periods of malfunction?

\_\_\_\_\_ If yes, did the operator:

- \_\_\_\_\_ record the actions taken for the event and report by phone such actions within two working days after actions were taken
- \_\_\_\_\_ send a letter within seven working days after the end of the event
- \_\_\_\_\_ provide the Inspector with copies of such reports and records

**7.0 Initial Performance Test:**

If the tank meets the following description, it is exempt from the initial performance test:

- \_\_\_\_\_ decorative chromium anodizing tank using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient

For non-exempt tanks, the owner or operator must have performed an initial performance test within 180 days of the source’s compliance date.

If no initial performance test was performed, explain

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Initial performance test was submitted to the Division

If no, explain \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Initial performance test was reviewed by the Division on \_\_\_\_\_

If no, explain \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ The Division provided a final determination to the source (and the County) whether the source was in compliance

Indicate the parameters obtained in the initial performance test to determine whether the source is in ongoing compliance.

Air Pollution Control Technique	Parameter Obtained in the Initial Test	Revised Chromium NESHAP Parameters
Composite mesh-pad	Pressure drop across system: _____ in. w.c. $\pm$ 1 in.	$\pm$ 2 in.
Packed bed scrubber	Pressure drop across system: _____ in. w.c. $\pm$ 1 in. & Velocity pressure at system inlet: _____ $\pm$ 10% ave. vel.	
Fiber-bed mist eliminator	Pressure drop across upstream control device that prevents plugging: _____ in. w.c. $\pm$ 1 in.	
Wetting agent	Surface tension at the bath: _____ dynes/cm	40 dynes/cm by stalagmometer, 33 by tensiometer
Foam blanket	Foam blanket thickness: _____ in. or cm	

8.0 Ongoing Compliance Monitoring: the Inspector should determine the type(s) of air pollution control technique(s) and whether the owner or operator has met the applicable ongoing compliance monitoring requirement.

Operator uses an add-on air pollution control device and measures:

Air Pollution Control Device	Yes/No	Monitored Parameter	Monitoring Frequency
Composite mesh-pad (CMP)	_____	Monitor pressure drop across system	Daily
Packed bed scrubber (PBS)	_____	Monitor pressure drop across system & Monitor velocity pressure at system inlet	Daily Daily
CMP/PBS	_____	Monitor pressure drop across the CMP & Monitor the velocity pressure at system inlet	Daily Daily
Fiber-bed mist eliminator	_____	Monitor pressure drop across the upstream control device that prevents plugging	Daily
Other	_____	Operator has determined the appropriate parameter: _____ The Division has approved the parameter The Operator has measured the parameter	Appropriate monitoring frequency: _____

The Inspector has personally seen the owner or operator measures, if required:

- \_\_\_\_\_ pressure drop across CMP system
- \_\_\_\_\_ pressure drop across PBS system
- \_\_\_\_\_ pressure drop across the FMBE system
- \_\_\_\_\_ velocity pressure at the system inlet
- \_\_\_\_\_ other \_\_\_\_\_

If the pressure drop must be measured, did the monitored value(s) (yes/no):

- \_\_\_\_\_ fall within the range established during the initial performance test
- \_\_\_\_\_ fall within  $\pm 2$  inches above the average water column measured during three performance tests

If yes to either, the source is in compliance.

If velocity pressure must be measured, did the monitored value(s) (yes/no):

- \_\_\_\_\_ fall within the range established during the initial performance test
- \_\_\_\_\_ fall within  $\pm 10$  percent above the average velocity pressure measured during three performance tests

If yes to either, the source is in compliance.

Operator uses a chemical fume suppressant air pollution control technique and takes the following measurements:

Air Pollution Control Device	Yes/No	Monitored Parameter	Monitoring Frequency
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Wetting agent	_____	Measure the surface tension at the bath	Daily or _____
Foam blanket	_____	Monitor foam blanket thickness	4 hours <sup>a,b</sup> or _____
Combination wetting agent and foam blanket	_____	Measure the surface tension at the bath	Daily or _____
Chemical fume suppressant and add-on control device	_____ _____	Measure the surface tension at the bath & Monitor foam blanket thickness	Daily or _____ Hourly <sup>b,c</sup> or _____
Other	_____ _____ _____	Operator has determined the appropriate parameter: _____ The Division has approved the parameter The Operator has measured the parameter	Appropriate monitoring frequency: _____

<sup>a</sup> If there are no exceedance of the maximum surface tension after forty hours of operation, then the monitoring frequency can be decreased to once every eight hours. If there are no exceedances for the next forty hours, then the frequency can be decreased to once every forty hours. If an exceedance occurs, the initial monitoring schedule must be resumed.

<sup>b</sup> The initial schedule must be resumed for every new tank solution.

<sup>c</sup> If there are no exceedances of the minimum foam blanket thickness after forty hours of operation, then the monitoring frequency can be decreased to once every four hours. If there are no exceedances for the next forty hours of operation, then the frequency can be decreases to once every eight hours. If an exceedance occurs, the initial monitoring schedule must be resumed.

Inspector has personally seen the owner or operator properly take the following measurements, if required:

\_\_\_\_\_ surface tension and/or  
\_\_\_\_\_ foam blanket thickness

\_\_\_\_\_ Did the surface tension exceed the maximum surface tension established by the owner or operator for pressure drop?

If no, the source is in compliance.

\_\_\_\_\_ Did the foam blanket thickness fall below the minimum foam blanket thickness or fall below 1 inch (2.54 cm) in thickness?

If no, the source is in compliance.

If the facility has multiple tanks and meets one of the following conditions, go to Table 2 (page 13) to obtain equations used to verify compliance with the emissions limits:

- \_\_\_\_\_ the multiple tanks include a chromium electroplating or chromium anodizing tank among other tanks not affected by the regulation, or
- \_\_\_\_\_ the multiple tanks include chromium tanks performing different operations subject to different emissions limits, which may or may not be controlled with nonaffected sources, or
- \_\_\_\_\_ the multiple tanks include chromium anodizing tanks subject to different emissions limits, which may or may not be controlled with nonaffected sources.

9.0 Recordkeeping: the owner or operator must keep the following records for at least five years to demonstrate compliance.

Inspection and maintenance records

- \_\_\_\_\_ work practices conducted on schedule
- \_\_\_\_\_ maintenance performed on process, control system(s), and monitoring equipment

Malfunction records

- \_\_\_\_\_ correction of malfunction consistent with the O&M plan no records required
- \_\_\_\_\_ correction of malfunction not consistent with O&M plan following records required: occurrence, duration, and cause of any malfunction of the process, air pollution control device, and monitoring equipment

Performance test records

- \_\_\_\_\_ performance test results including process and air pollution control parameter measurements used during testing and any additional measurements

Monitoring data records, include at a minimum

- \_\_\_\_\_ identify control system(s)
- \_\_\_\_\_ identify the monitored parameter(s)
- \_\_\_\_\_ identify the value of the monitored parameter(s)
- \_\_\_\_\_ identify the time and date when the parameter(s) was monitored

Excess emission records

- \_\_\_\_\_ excess emission records must include at a minimum the start and end times and dates of each period of excess emissions
- \_\_\_\_\_ excess caused by malfunction operator records: type of malfunction, duration of malfunction, cause of malfunction, corrective actions, and date and time of malfunction
- \_\_\_\_\_ excess emission caused by something other than malfunction

Process records, include at a minimum

- \_\_\_\_\_ process operating time for each tank
- \_\_\_\_\_ time and date of each addition of fume suppressant, if using

Miscellaneous records

- \_\_\_\_\_ other records required by permit or notice of violation
- \_\_\_\_\_ documentation supporting the requirements of a waiver, if granted

10.0 Reporting:

Type of Source	Relevant Dates	Yes/No	Requirements
Existing	Initial startup before 1/25/1995	_____	Initial notification on or before 7/24/1995
New or reconstructed	Initial startup after 1/25/1995, constructed or reconstructed before 1/25/1995	_____ _____	Notification of date of construction or reconstruction Notification of actual startup within 30 days
New or reconstructed	Initial startup after 1/25/1995, constructed or reconstructed after 1/25/1995	_____ _____	Notification of date of construction or reconstruction within 30 days Notification of actual startup within 30 days

\_\_\_\_\_ Notification of construction or reconstruction of the facility, if begun after January 25, 1995

\_\_\_\_\_ Notification of initial performance testing at least 60 calendar days prior the scheduled date of the test

A site specific test plan prior to the initial performance test that includes:

- \_\_\_\_\_ description of the process to be tested
- \_\_\_\_\_ conditions under which testing is to be conducted
- \_\_\_\_\_ sampling location description
- \_\_\_\_\_ test method to be used

- \_\_\_\_\_ A performance test report, including
  - \_\_\_\_\_ description of the process to be tested
  - \_\_\_\_\_ sampling location descriptions
  - \_\_\_\_\_ sampling and analysis procedures and any modifications to the standard procedures
  - \_\_\_\_\_ description of the internal and external quality assurance program
  - \_\_\_\_\_ records of operating conditions during testing, preparation of the standards, and calibration procedures
  - \_\_\_\_\_ raw data sheets for field sampling and field and laboratory

analyses

- \_\_\_\_\_ documentation of calculations
- \_\_\_\_\_ any additional information required by the test method
- \_\_\_\_\_ internal quality assurance program, including activities planned by routine operators and analysts to provide assessment of test data precision

If no, explain \_\_\_\_\_

A report of the following was sent within 90 days after the performance test and no later than 30 days after the compliance date

\_\_\_\_\_ performance test results

- \_\_\_\_\_ compliance status
- \_\_\_\_\_ copy of performance test report

A compliance status report that included

- \_\_\_\_\_ applicable emission limitation and methods used to determine compliance
- \_\_\_\_\_ if performance test is required, the test report documenting the results
- \_\_\_\_\_ type and quantity of hazardous air pollutants emitted
- \_\_\_\_\_ specific operating parameter value, or range, for each monitored parameter
- \_\_\_\_\_ methods that will be used to determine continuous compliance
- \_\_\_\_\_ description of the air pollution control technique for each emission point
- \_\_\_\_\_ statement that the operator has the O&M plan completed and on file
- \_\_\_\_\_ statement by the operator as to whether the tank is in compliance

An ongoing compliance status report, based on

- \_\_\_\_\_ a major source: prepare and submit a report to the Division every six months unless the Division decides more frequent reports are required
- \_\_\_\_\_ a major source that experienced exceedances: report to the Division every three months
- \_\_\_\_\_ an area source: report to the Division annually
- \_\_\_\_\_ an area source that experienced exceedances  $\geq$  1% of total operating time for the reporting period and total duration of malfunctions is  $\geq$  5% of the total operating time: report to the Division every six months

**Table 1**  
**Emission Limits for Chromium Electroplating Tanks - Single Source/Tank**

Single Tank	Hexavalent or Trivalent Solution	PFOS	Required Emission Limit
Hard Chromium <ul style="list-style-type: none"> <li>• Large, existing</li> <li>• Small, existing</li> <li>• New</li> </ul>	n/a	After 9/21/2015, shall not add PFOS-based fume suppressants	<ul style="list-style-type: none"> <li>• 0.011 mg/dscm</li> <li>• 0.015 mg/dscm</li> <li>• 0.006 mg/dscm</li> </ul> <ul style="list-style-type: none"> <li>• or surface tension: 40 or 33 dynes/cm</li> </ul>
Decorative <ul style="list-style-type: none"> <li>• Existing</li> <li>• New</li> <li>• Reconstructed</li> </ul>	Hexavalent & chromium anodizing tanks	After 9/21/2015, shall not add PFOS-based fume suppressants	<ul style="list-style-type: none"> <li>• 0.007 mg/dscm</li> <li>• 0.006 mg/dscm</li> <li>• 0.006 mg/dscm</li> </ul> <ul style="list-style-type: none"> <li>• or surface tension: 40 or 33 dynes/cm</li> </ul>
Decorative <ul style="list-style-type: none"> <li>• Existing</li> <li>• New</li> <li>• Reconstructed</li> </ul>	Trivalent & wetting agent as ingredient	After 9/21/2015, shall not add PFOS-based fume suppressants	None - must keep records and report

**Table 2  
Emission Limits for Chromium Electroplating Tanks - Multiple Sources/Tanks**

Group of tanks with any one tank operating	Common add-on air pollution control device	Each tank performs same type of operation	Each tank subject to the same emission limits	Control device controls nonaffected tanks	Required emission limits
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	Yes	No	63.342(c), (d), or (e) <sup>a</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	Yes	Yes	63.344(e)(3) <sup>b</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	No	Yes	Yes or no	63.344(e)(4) <sup>c</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	No	Yes or no	63.344(e)(4) <sup>c</sup>

<sup>a</sup> 63.342(c) standards for open or enclosed surface hard chromium electroplating tanks, (d) standards for decorative chromium electroplating tanks using a chromic acid bath and chromium anodizing tanks, (e) standards for decorative chromium electroplating tanks using a trivalent chromium bath (see Table 1.1)

<sup>b</sup> Special compliance provisions for multiple sources, performing the same type of operation, subject to the same emission limits, and controlled by a common add-on air pollution control device (also controlling emissions from sources not affected by these standards):

(i) Calculate the cross-sectional area of each inlet duct, including those not affected by the standard

(ii) Determine the total sample time per test run by dividing the total inlet area from all tanks connected to the control system by the total inlet area for all ducts associated with the

affected source, then multiple this number by two hours; this calculated time is the minimum sample time required per test run

(iii) Perform Method 306 or 306A testing and calculate an outlet mass emission rate

(iv) Determine the total ventilation rate from the affected sources by using equation:

$$VR_{tot} \times IDA_i / \Sigma IA_{total} = VR_{inlet}$$

where  $VR_{tot}$  is the average total ventilation rate in dscm/min for the three test runs as determined at the outlet by mass of the Method 306 or 306A testing;  $IDA_i$  is the total inlet duct area for all ducts associated with affected sources;  $\Sigma IA_{total}$  is the sum of all inlet duct areas from both affected and nonaffected sources; and  $VR_{inlet}$  is the total ventilation rate from all inlet ducts associated with affected sources.

(v) Establish the allowable mass emission rate of the system ( $AMR_{sys}$ ) in milligrams of total chromium per hour (mg/hr) using equation:

$$\Sigma VR_{inlet} \times EL \times 60 \text{ minutes/hour} = AMR_{sys}$$

where  $\Sigma VR_{inlet}$  is the total ventilation rate in dscm/min from the affected sources and EL is the applicable emission limitation from 40 C.F.R. 63.342 in mg/dscm. The allowable mass emission rate ( $AMR_{sys}$ ) calculated should be equal to or more than the outlet three-run average mass emission rate determined from Method 306 or 306A testing in order for the source to be in compliance with the standard.

<sup>c</sup> Special compliance provisions for multiple sources, performing different types of operations, and controlled by a common add-on air pollution control device (that may or may not also be controlling emissions from sources not affected by these standards) OR multiple sources, performing same types of operations, subject to different emission limits, and controlled by a common add-on air pollution control device:

(i) Calculate the cross-sectional area of each inlet duct, including those not affected by the standard

(ii) Determine the total sample time per test run by dividing the total inlet area from all tanks connected to the control system by the total inlet area for all ducts associated with the affected source, then multiple this number by two hours; this calculated time is the minimum sample time required per test run

(iii) Perform Method 306 or 306A testing and calculate an outlet mass emission rate

(iv) Determine the total ventilation rate from the affected sources by using equation:

$$VR_{tot} \times IDA_i / \Sigma IA_{total} = VR_{inlet,a}$$

where  $VR_{tot}$  is the average total ventilation rate in dscm/min for the three test runs as determined at the outlet by mass of the Method 306 or 306A testing;  $IDA_i$  is the total inlet duct area for all ducts conveying chromic acid from each type of affected source performing the same operation, or each type of affected source subject to the same emission limitation;  $\Sigma IA_{total}$  is the sum of all inlet duct areas from both affected and nonaffected sources; and  $VR_{inlet,a}$  is the total ventilation rate from all inlet ducts conveying chromic acid from each type of affected source performing the same operation, or each type of affected source subject to the same emission limitation.

(v) Establish the allowable mass emission rate in mg/hr for each type of affected source that is controlled by the add-on air pollution control device using the appropriate equation:

$$\begin{aligned} VR_{hc1} \times EL_{hc1} \times 60 \text{ minutes/hour} &= AMR_{hc1} \\ VR_{hc2} \times EL_{hc2} \times 60 \text{ minutes/hour} &= AMR_{hc2} \\ VR_{dc} \times EL_{dc} \times 60 \text{ minutes/hour} &= AMR_{dc} \\ VR_{ca} \times EL_{ca} \times 60 \text{ minutes/hour} &= AMR_{ca} \end{aligned}$$

where hc applies to the total centilation rates for all hard chromium electroplating tanks subject to the same emission limitation; dc applies to the total of ventilation rates for the decorative chromium electroplating tanks; ca applies to the tlital of ventilation rates for the chromium anodizing tanks; and EL is the applicable emission limitation from 40 C.F.R. 63.342 in mg/dscm. There are two equations for hard chromium electroplating tanks because different emission limitations may apply (e.g., a new tank versus an existing, small tank).

(vi) Establish the allowable mass emission rate ( $AMR_{sys}$ ) in mg/hr for the system using the equation 8, including each type of affected source as appropriate:

$$AMR_{hc1} + AMR_{hc2} + AMR_{dc} + AMR_{ca} = AMR_{sys}$$

The allowable mass emission rate calculated from this equation should be equal to or more than the outlet three-run average mass emission rate determined from Method 306 or 306A testing in order for the source to be in compliance with the standards.

**Table 3**  
**Summary of Operation and Maintenance Practices**

Control Device	Work Practice Standards	Time Required
Composite Mesh Pad System	<ol style="list-style-type: none"> <li>1. Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.</li> <li>2. Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.</li> <li>3. Visually inspect ductwork from tank to the control device to ensure there are no leaks.</li> <li>4. Perform washdown of the composite mesh pads in accordance with manufacturer's recommendations.</li> </ol>	<ol style="list-style-type: none"> <li>1. 1/quarter</li> <li>2. 1/quarter</li> <li>3. 1/quarter</li> <li>4. Per manufacturer</li> </ol>
Packed Bed Scrubber System	<ol style="list-style-type: none"> <li>1. Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the backed beds, and no evidence of chemical attack on the structural integrity of the device.</li> <li>2. Visually inspect back portion of the chevron blade mist eliminator to ensure that it is dry and there is no breakthrough of chromic acid mist.</li> <li>3. Visually inspect ductwork from tank to the control device to ensure there are no leaks.</li> <li>4. Add fresh makeup water to the top of the packed bed. <sup>a,b</sup></li> </ol>	<ol style="list-style-type: none"> <li>1. 1/quarter</li> <li>5. 1/quarter</li> <li>6. 1/quarter</li> <li>7. Whenever makeup is added</li> </ol>
CMP/PBS System	Same as for CMP system	Same as for CMP system
Fiber-Bed Mist Eliminator <sup>c</sup>	<ol style="list-style-type: none"> <li>1. Visually inspect fiber-bed unit and prefiltered device to ensure there is proper drainage, no chromic acid buildup, and no evidence of chemical attack on the structural integrity.</li> <li>2. Visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks.</li> </ol>	<ol style="list-style-type: none"> <li>1. 1/quarter</li> <li>2. 1/quarter</li> <li>3. 1/quarter</li> <li>4. Per manufact</li> </ol>

	3. Perform washdown of fiber elements in accordance with the manufacturer's recommendations.	urer
Other devices	To be proposed by the source for approval by the EPA.	To be proposed by the source
<b>Monitoring Equipment</b>		
Pilot Tube	Backflush with water, or remove from duct and rinse with fresh water. Replace and rotate 180 ° to the ensure same zero reading. Check pilot tube ends for damage, replace if cracked or fatigued.	1/quarter
Stalagmometer	Follow manufacturer's recommendations.	

<sup>a</sup> If greater than 50 percent of the scrubber water is drained (e.g., for maintenance purposes), makeup water may be added to the scrubber basin.

<sup>b</sup> For horizontal-flow scrubbers, top is defined as the section of the unit directly above the packaging media such that the makeup water would flow perpendicular to the air flow through the packing. For vertical-flow units, the top is defined as the area downstream of the packing material such that the makeup water would flow countercurrent to the air flow through the unit.

<sup>c</sup> Work practice standards for the control device installed upstream of the fiber-bed mist eliminator to prevent plugging do not apply as long as the work practice standards for the fiber-bed unit are followed.

**Table 4  
Housekeeping Practices**

<b>For</b>	<b>You must:</b>	<b>At this minimum frequency</b>
1. Any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium.	a. Store the substance in a closed container in an enclosed storage area or building; and b. Use a closed container when transporting the substance from the enclosed storage area.	a. At all times, except when transferring the substance to and from the container. b. Whenever transporting the substance, except when transferring the substance to and from the container.
2. Each affected tank, to minimize spills of bath solution that result from dragout. Note: this measure does not require the return of contaminated bath solution to the tank. This requirement applies only as the parts are removed from the tank. Once away from the tank area, any spilled solution must be handled as in item 4.	a. Install drip trays that collect and return to the tank any bath solution that drips or drains from parts as the parts are removed from the tank; or b. Contain and return to the tank any bath solution that drains or drips from parts as the parts are removed; or c. Collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed.	a. Prior to operating the tank. b. Whenever removing parts from an affected tank. c. Whenever removing parts from an affected tank.
3. Each spraying operation for removing excess chromic acid from parts removed from, and occurring over, an affected tank.	Install a splash guard to minimize overspray during spraying operations and ensure that any hexavalent chromium laden liquid captured by the splash guard is returned to the electroplating or anodizing tank.	Prior to any such spraying operation.
4. Each operation that involves the handling or	Begin cleanup, or otherwise contain, all spills of the substance. Note: substances	Within 1 hour of the spill.

use of any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium.	that fall or flow into drip trays, pans, sumps, or other containment areas are not considered spills.	
5. Surfaces within the enclosed storage area, open floor area, walkways around affected tanks contaminated with hexavalent chromium from an affected chromium electroplating or chromium anodizing tank.	a. Clean the surfaces using one or more of the following: HEPA vacuuming; hand-wiping with a damp cloth; wet mopping; hose down or rise with potable water that is collected in a wastewater collection system; other cleaning method approved by the permitting authority; or b. Apply a non-toxic chemical dust suppressant to the surfaces.	a. At least once every 7 days if one or more electroplating or anodizing tanks were used, or at least after every 40 hours of operation of one or more affected electroplating or anodizing tanks, whichever is later. b. According to manufacturer's recommendations.
6. All buffing, grinding, or polishing operations located in the same room as electroplating or anodizing operations.	Separate the operation from any affected electroplating or anodizing operation by installing a physical barrier; the barrier may take the form of plastic strip curtains.	Prior to beginning the buffing, grinding, or polishing operation.
7. All chromium or chromium-containing wastes generated from housekeeping activities.	Store, dispose, recover, or recycle the wastes using practices that do not lead to fugitive dust and in accordance with hazardous waste requirements.	At all time.

[INSPECTOR CHECKLIST, DECORATIVE CHROMIUM ELECTROPLATING](#)

Applicable regulation: Chromium NESHAP at 40 C.F.R. Part 60, Subpart N.

The Inspector must complete one checklist for each source or tank inspected.

Tank Number: \_\_\_\_\_

Date Inspected: \_\_\_\_\_

1.0 Compliance Date: the date by which a source must comply with the Chromium NESHAP depends on whether the source is existing or new/reconstructed.

	<b>Compliance Date</b>
Existing	September 19, 2014
New/reconstruction with initial startup after September 19, 2012	Immediately upon startup
Existing area source that becomes major	Immediately
New area source (after February 8, 2012) that becomes major	Immediately
Small facility that becomes large	Within 1 year of becoming major

This source had an initial startup date of \_\_\_\_\_

This is a (existing, new, reconstructed) source \_\_\_\_\_

This source must be in compliance as of \_\_\_\_\_

This source was in compliance on \_\_\_\_\_ OR

This source is not in compliance because \_\_\_\_\_

2.0 Size of Facility: the owner or operator must demonstrate whether it is a large or small facility using one of the following methods. The Inspector may request any records necessary to verify the size of the facility such as tank manufacturer's descriptive documentation, calculation sheets, or operating records.

Capacity of the facility \_\_\_\_\_ million amp-hr/yr  
(total rectifier capacity of all tanks x 8400 x 0.7 = ampere hours/year)

\_\_\_\_\_ large: maximum cumulative rectifier capacity of all the hard chromium electroplating tanks within the facility is equal to or greater than sixty million amp-hr/yr

\_\_\_\_\_ small: maximum cumulative rectifier capacity of all the hard chromium electroplating tanks within the facility is less than sixty million amp-hr/yr

\_\_\_\_\_ size determined by actual cumulative rectifier capacity for the previous twelve month rolling period (see Inspector's Guidance Manual Section 3.3.3 for determining size based on actual cumulative rectifier capacity)

3.0 Facility is a Major or Area source: the owner or operator must have records which enable the Inspector to determine a source's potential to emit chromium.

Major source if has the potential to emit ten tons per year of any one hazardous air pollutant (HAP) or twenty five tons per year of any combination of HAPs

Area source if not a major source

Major source if an area source increases the potential to emit above ten tons per year of any one HAP or twenty five tons per year of any combination of HAPs

4.0 Type of Bath Solution Used: if an operator uses a trivalent solution with a wetting agent incorporated as a bath ingredient, many requirements may be avoided, as indicated throughout this checklist.

hexavalent (chromic acid)

trivalent without a wetting agent as a bath ingredient

trivalent with a wetting agent as a bath ingredient

5.0 Type of Air Pollution Control Device: the owner or operator should have documentation available on the control device(s) utilized and should demonstrate that the device(s) is functioning properly.

Add-on air pollution control devices:

Composite mesh-pad system (CMP)

Packed bed scrubber (PBS)

CMP/PBS system

Fiber-bed mist eliminator

Other \_\_\_\_\_ (need Division or EPA approved documentation)

Chemical fume suppressant air pollution control devices:

Foam blanket

Wetting agent

Other \_\_\_\_\_ (need Division or EPA approved documentation)

If using both an add-on and fume suppressant air pollution control device:

Type of add-on device(s): \_\_\_\_\_

Type of fume suppressant(s): \_\_\_\_\_

6.0 Number of Tanks Attached to the Same Air Pollution Control Device:

Single tank attached to one control device

- Multiple tanks attached to one control device
- Same operation performed at each tank
- Same emission limit for each tank
- Control device controls sources that are not chromium electroplating or anodizing tanks

7.0 Emission Limits: using the information from sections 1.0 and 4.0, answer:

The emission limit for this source, as determined by Tables 1 and 2 (pages 29 and 30) is

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Describe whether the source met the emission limits by the required compliance date

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If the source failed to meet the required emission limits by the compliance date, explain why

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8.0 Operation and Maintenance (O&M) Plan: if a decorative chromium tank uses a trivalent chromium solution that includes a wetting agent as an ingredient, the operator need not comply with the requirements in this section.

- O&M plan is kept on record and available upon inspection, for the life of the affected source or until the source is no longer subject to the Chromium NESHAP
- The owner or operator, upon revision of the O&M plan, kept previous versions for a period of five years after each revision
- O&M plan is incorporated by reference into the facility's operating permit

O&M plan for this facility (yes/no):

- specifies the operating and maintenance criteria for the affected source
- specifies the housekeeping procedures (Table 4, page 34)
- specifies the add-on air pollution control device, if used to comply with the emission requirements
- specifies the process and control system monitoring equipment
- includes a standardized checklist to document the operation and maintenance of the air pollution control device(s) and process and control system monitoring equipment
- specifies procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur

\_\_\_\_\_ includes a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions

If the facility utilizes any add-on air pollution control devices:

\_\_\_\_\_ the O&M plan incorporates operation and maintenance practices for any add-on air pollution control device or monitoring equipment identified in Table 3 (page 33)

List the applicable operation and maintenance practices for the add-on air pollution control device(s) uses and whether the operator has complied:

Add-on Air Pollution Control Device	Operation and Maintenance Practice	Compliance (yes/no)
1.	a. b. c. d.	a. b. c. d.
2.	a. b. c. d.	a. b. c. d.
3.	a. b. c. d.	a. b. c. d.

\_\_\_\_\_ if the specific equipment used is not identified in Table 3, the O&M plan shall incorporate proposed operation and maintenance practices which must be submitted to the Division and the EPA

The owner or operator operates and maintains all of the following in a manner consistent with “good air pollution control practices,” including quarterly inspections (yes/no):

- \_\_\_\_\_ affected sources and ductwork of the sources
- \_\_\_\_\_ associated control devices
- \_\_\_\_\_ monitoring equipment

The following documentation was provided to establish whether the owner or operator properly maintained the source in a manner consistent with “good air pollution control practices” (yes/no):

- \_\_\_\_\_ monitoring results
- \_\_\_\_\_ review of the O&M plan, procedures, and records
- \_\_\_\_\_ inspection of the source
- \_\_\_\_\_ other \_\_\_\_\_

O&M plan does not meet the requirements, revisions must be made:  
\_\_\_\_\_ does not address a malfunction that has occurred  
\_\_\_\_\_ fails to provide for the operation of the affected source, the air pollution control technique, or the control system and process monitoring equipment during a malfunction in a manner consistent with “good air pollution control practices”  
\_\_\_\_\_ does not provide adequate procedures for correcting malfunctions

Has a malfunction occurred? \_\_\_\_\_

Did the O&M plan fail to or inadequately address the malfunction? \_\_\_\_\_  
If yes, explain \_\_\_\_\_

If the O&M plan failed to or inadequately addressed the malfunction, did the owner or operator revise the O&M plan within forty five days after the event?

\_\_\_\_\_  
If no, explain \_\_\_\_\_

If yes, does the revised O&M plan include:

\_\_\_\_\_ procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunctions  
\_\_\_\_\_ a program for corrective actions for such events

Did the owner or operator take actions inconsistent with the procedures specified in the O&M plan during periods of malfunction?

\_\_\_\_\_  
If yes, did the operator:

\_\_\_\_\_ record the actions taken for the event and report by phone such actions within two working days after actions were taken  
\_\_\_\_\_ send a letter within seven working days after the end of the event  
\_\_\_\_\_ provide the Inspector with copies of such reports and records

## 9.0 Initial Performance Test:

If the tank meets the following description, it is exempt from the initial performance test:

\_\_\_\_\_ decorative chromium anodizing tank using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient

For non-exempt tanks, the owner or operator must have performed an initial performance test within 180 days of the source’s compliance date.

If no initial performance test was performed, explain

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_ Initial performance test was submitted to the Division  
 If no, explain \_\_\_\_\_

\_\_\_\_\_ Initial performance test was reviewed by the Division on \_\_\_\_\_  
 If no, explain \_\_\_\_\_

\_\_\_\_\_ The Division provided a final determination to the source (and the County) whether the source was in compliance

Indicate the parameters obtained in the initial performance test to determine whether the source is in ongoing compliance.

Air Pollution Control Technique	Parameter Obtained in the Initial Test	Revised Chromium NESHAP Parameters
Composite mesh-pad	Pressure drop across system: _____ in. w.c. $\pm$ 1 in.	$\pm$ 2 in.
Packed bed scrubber	Pressure drop across system: _____ in. w.c. $\pm$ 1 in. & Velocity pressure at system inlet: _____ $\pm$ 10% ave. vel.	
Fiber-bed mist eliminator	Pressure drop across upstream control device that prevents plugging: _____ in. w.c. $\pm$ 1 in.	
Wetting agent	Surface tension at the bath: _____ dynes/cm	40 dynes/cm by stalagmometer, 33 by tensiometer
Foam blanket	Foam blanket thickness: _____ in. or cm	

10.0 Ongoing Compliance Monitoring: the Inspector should determine the type(s) of air pollution control technique(s) and whether the owner or operator has met the applicable ongoing compliance monitoring requirement.

Operator uses an add-on air pollution control device and measures:

Air Pollution Control Device	Yes/No	Monitored Parameter	Monitoring Frequency
Composite mesh-pad (CMP)	_____	Monitor pressure drop across system	Daily
Packed bed scrubber (PBS)	_____	Monitor pressure drop across system & Monitor velocity pressure at system inlet	Daily Daily
CMP/PBS	_____	Monitor pressure drop across the CMP & Monitor the velocity pressure at system inlet	Daily Daily
Fiber-bed mist eliminator	_____	Monitor pressure drop across the upstream control device that prevents plugging	Daily
Other	_____	Operator has determined the appropriate	Appropriate

	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	parameter: _____ The Division has approved the parameter The Operator has measured the parameter	monitoring frequency: _____
--	----------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------	--------------------------------

The Inspector has personally seen the owner or operator measures, if required:

- \_\_\_\_\_ pressure drop across CMP system
- \_\_\_\_\_ pressure drop across PBS system
- \_\_\_\_\_ pressure drop across the FMBE system
- \_\_\_\_\_ velocity pressure at the system inlet
- \_\_\_\_\_ other \_\_\_\_\_

If the pressure drop must be measured, did the monitored value(s) (yes/no):

- \_\_\_\_\_ fall within the range established during the initial performance test
- \_\_\_\_\_ fall within  $\pm 2$  inches above the average water column measured during three performance tests

If yes to either, the source is in compliance.

If velocity pressure must be measured, did the monitored value(s) (yes/no):

- \_\_\_\_\_ fall within the range established during the initial performance test
- \_\_\_\_\_ fall within  $\pm 10$  percent above the average velocity pressure measured during three performance tests

If yes to either, the source is in compliance.

Operator uses a chemical fume suppressant air pollution control technique and takes the following measurements:

Air Pollution Control Device	Yes/No	Monitored Parameter	Monitoring Frequency
Wetting agent	_____	Measure the surface tension at the bath	Daily or _____
Foam blanket	_____	Monitor foam blanket thickness	4 hours <sup>a,b</sup> or _____
Combination wetting agent and foam blanket	_____	Measure the surface tension at the bath	Daily or _____
Chemical fume suppressant and add-on control device	<input type="checkbox"/> <input type="checkbox"/>	Measure the surface tension at the bath & Monitor foam blanket thickness	Daily or _____ Hourly <sup>b,c</sup> or _____
Other	<input type="checkbox"/> <input type="checkbox"/>	Operator has determined the appropriate parameter: _____ The Division has approved the parameter The Operator has measured the parameter	Appropriate monitoring frequency: _____

<sup>a</sup> If there are no exceedance of the maximum surface tension after forty hours of operation, then the monitoring frequency can be decreased to once every eight hours. If there are no exceedances for the next forty hours, then the frequency can be decreased to once every forty hours. If an exceedance occurs, the initial monitoring schedule must be resumed.

<sup>b</sup> The initial schedule must be resumed for every new tank solution.

<sup>c</sup> If there are no exceedances of the minimum foam blanket thickness after forty hours of operation, then the monitoring frequency can be decreased to once every four hours. If there are no exceedances for the next forty hours of operation, then the frequency can be decreased to once every eight hours. If an exceedance occurs, the initial monitoring schedule must be resumed.

Inspector has personally seen the owner or operator properly take the following measurements, if required:

- surface tension and/or
- foam blanket thickness

Did the surface tension exceed the maximum surface tension established by the owner or operator for pressure drop?

If no, the source is in compliance.

Did the foam blanket thickness fall below the minimum foam blanket thickness or fall below 1 inch (2.54 cm) in thickness?

If no, the source is in compliance.

If the facility has multiple tanks and meets one of the following conditions, go to Table 2 (page 30) to obtain equations used to verify compliance with the emissions limits:

- the multiple tanks include a chromium electroplating or chromium anodizing tank among other tanks not affected by the regulation, or
- the multiple tanks include chromium tanks performing different operations subject to different emissions limits, which may or may not be controlled with nonaffected sources, or
- the multiple tanks include chromium anodizing tanks subject to different emissions limits, which may or may not be controlled with nonaffected sources.

11.0 Recordkeeping: the owner or operator must keep the following records for at least five years to demonstrate compliance.

Inspection and maintenance records

- work practices conducted on schedule
- maintenance performed on process, control system(s), and monitoring equipment

Malfunction records

- correction of malfunction consistent with the O&M plan no records required
- correction of malfunction not consistent with O&M plan following records required: occurrence, duration, and cause of any malfunction of the process, air pollution control device, and monitoring equipment

Performance test records

\_\_\_\_\_ performance test results including process and air pollution control parameter measurements used during testing and any additional measurements

Monitoring data records, include at a minimum

- \_\_\_\_\_ identify control system(s)
- \_\_\_\_\_ identify the monitored parameter(s)
- \_\_\_\_\_ identify the value of the monitored parameter(s)
- \_\_\_\_\_ identify the time and date when the parameter(s) was monitored

Excess emission records

- \_\_\_\_\_ excess emission records must include at a minimum the start and end times and dates of each period of excess emissions
- \_\_\_\_\_ excess caused by malfunction operator records: type of malfunction, duration of malfunction, cause of malfunction, corrective actions, and date and time of malfunction
- \_\_\_\_\_ excess emission caused by something other than malfunction

Process records, include at a minimum

- \_\_\_\_\_ process operating time for each tank
- \_\_\_\_\_ time and date of each addition of fume suppressant, if using

Miscellaneous records

- \_\_\_\_\_ other records required by permit or notice of violation
- \_\_\_\_\_ documentation supporting the requirements of a waiver, if granted

## 12.0 Reporting:

Type of Source	Relevant Dates	Yes/No	Requirements
Existing	Initial startup before 1/25/1995	_____	Initial notification on or before 7/24/1995
New or reconstructed	Initial startup after 1/25/1995, constructed or reconstructed before 1/25/1995	_____ _____	Notification of date of construction or reconstruction Notification of actual startup within 30 days
New or reconstructed	Initial startup after 1/25/1995, constructed or reconstructed after 1/25/1995	_____ _____	Notification of date of construction or reconstruction within 30 days Notification of actual startup within 30 days

\_\_\_\_\_ Notification of construction or reconstruction of the facility, if begun after January 25, 1995

\_\_\_\_\_ Notification of initial performance testing at least 60 calendar days prior the scheduled date of the test

A site specific test plan prior to the initial performance test that includes:

- \_\_\_\_\_ description of the process to be tested
- \_\_\_\_\_ conditions under which testing is to be conducted
- \_\_\_\_\_ sampling location description
- \_\_\_\_\_ test method to be used

\_\_\_\_\_ A performance test report, including

- \_\_\_\_\_ description of the process to be tested
- \_\_\_\_\_ sampling location descriptions
- \_\_\_\_\_ sampling and analysis procedures and any modifications to the standard procedures
- \_\_\_\_\_ description of the internal and external quality assurance program
- \_\_\_\_\_ records of operating conditions during testing, preparation of the standards, and calibration procedures
- \_\_\_\_\_ raw data sheets for field sampling and field and laboratory analyses
- \_\_\_\_\_ documentation of calculations
- \_\_\_\_\_ any additional information required by the test method
- \_\_\_\_\_ internal quality assurance program, including activities planned by routine operators and analysts to provide assessment of test data precision

If no, explain \_\_\_\_\_

A report of the following was sent within 90 days after the performance test and no later than 30 days after the compliance date

- \_\_\_\_\_ performance test results
- \_\_\_\_\_ compliance status
- \_\_\_\_\_ copy of performance test report

A compliance status report that included

- \_\_\_\_\_ applicable emission limitation and methods used to determine compliance
- \_\_\_\_\_ if performance test is required, the test report documenting the results
- \_\_\_\_\_ type and quantity of hazardous air pollutants emitted
- \_\_\_\_\_ specific operating parameter value, or range, for each monitored parameter
- \_\_\_\_\_ methods that will be used to determine continuous compliance
- \_\_\_\_\_ description of the air pollution control technique for each emission point
- \_\_\_\_\_ statement that the operator has the O&M plan completed and on file
- \_\_\_\_\_ statement by the operator as to whether the tank is in compliance

An ongoing compliance status report, based on

- \_\_\_\_\_ a major source: prepare and submit a report to the Division every six months unless the Division decides more frequent reports are required
- \_\_\_\_\_ a major source that experienced exceedances: report to the Division every three months

- \_\_\_\_\_ an area source: report to the Division annually
- \_\_\_\_\_ an area source that experienced exceedances  $\geq$  1% of total operating time for the reporting period and total duration of malfunctions is  $\geq$  5% of the total operating time: report to the Division every six months

The owner or operator of a decorative chromium electroplating tank using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient must demonstrate the following reporting:

- \_\_\_\_\_ an initial notification by July 24, 1995, that the source is subject to the regulation including a statement that the trivalent chromium process incorporating a wetting agent will be used and a list of bath components that comprise the trivalent chromium bath with the wetting agent clearly identified
- \_\_\_\_\_ a report of the performance test results and compliance status after the test or by February 24, 1996
- \_\_\_\_\_ if the owner or operator changed the process from trivalent chromium bath to another process, the owner or operator must submit a report within 30 calendar days after the change that contains a description of how the process was changed; emission limitation that now applies; and the notification, reporting, and recordkeeping requirements in Sections 10.0 and 11.0

**Table 1**  
**Emission Limits for Chromium Electroplating Tanks - Single Source/Tank**

Single Tank	Hexavalent or Trivalent Solution	PFOS	Required Emission Limit
Hard Chromium <ul style="list-style-type: none"> <li>• Large, existing</li> <li>• Small, existing</li> <li>• New</li> </ul>	n/a	After 9/21/2015, shall not add PFOS-based fume suppressants	<ul style="list-style-type: none"> <li>• 0.011 mg/dscm</li> <li>• 0.015 mg/dscm</li> <li>• 0.006 mg/dscm</li> <li>• or surface tension: 40 or 33 dynes/cm</li> </ul>
Decorative <ul style="list-style-type: none"> <li>• Existing</li> <li>• New</li> <li>• Reconstructed</li> </ul>	Hexavalent & chromium anodizing tanks	After 9/21/2015, shall not add PFOS-based fume suppressants	<ul style="list-style-type: none"> <li>• 0.007 mg/dscm</li> <li>• 0.006 mg/dscm</li> <li>• 0.006 mg/dscm</li> <li>• or surface tension: 40 or 33 dynes/cm</li> </ul>
Decorative <ul style="list-style-type: none"> <li>• Existing</li> <li>• New</li> <li>• Reconstructed</li> </ul>	Trivalent & wetting agent as ingredient	After 9/21/2015, shall not add PFOS-based fume suppressants	None - must keep records and report

**Table 2**  
**Emission Limits for Chromium Electroplating Tanks - Multiple Sources/Tanks**

Group of tanks with any one tank operating	Common add-on air pollution control device	Each tank performs same type of operation	Each tank subject to the same emission limits	Control device controls nonaffected tanks	Required emission limits
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	Yes	No	63.342(c), (d), or (e) <sup>a</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	Yes	Yes	63.344(e)(3) <sup>b</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	No	Yes	Yes or no	63.344(e)(4) <sup>c</sup>
Hard chromium, Decorative chromium, Chromium anodizing	Yes	Yes	No	Yes or no	63.344(e)(4) <sup>c</sup>

<sup>a</sup> 63.342(c) standards for open or enclosed surface hard chromium electroplating tanks, (d) standards for decorative chromium electroplating tanks using a chromic acid bath and chromium anodizing tanks, (e) standards for decorative chromium electroplating tanks using a trivalent chromium bath (see Table 1.1)

<sup>b</sup> Special compliance provisions for multiple sources, performing the same type of operation, subject to the same emission limits, and controlled by a common add-on air pollution control device (also controlling emissions from sources not affected by these standards):

(i) Calculate the cross-sectional area of each inlet duct, including those not affected by the standard

(ii) Determine the total sample time per test run by dividing the total inlet area from all tanks connected to the control system by the total inlet area for all ducts associated with the affected source, then multiple this number by two hours; this calculated time is the minimum sample time required per test run

(iii) Perform Method 306 or 306A testing and calculate an outlet mass emission rate

(iv) Determine the total ventilation rate from the affected sources by using equation:

$$VR_{tot} \times IDA_i / \Sigma IA_{total} = VR_{inlet}$$

where  $VR_{tot}$  is the average total ventilation rate in dscm/min for the three test runs as determined at the outlet by mass of the Method 306 or 306A testing;  $IDA_i$  is the total inlet duct area for all ducts associated with affected sources;  $\Sigma IA_{total}$  is the sum of all inlet duct areas from both affected and nonaffected sources; and  $VR_{inlet}$  is the total ventilation rate from all inlet ducts associated with affected sources.

(v) Establish the allowable mass emission rate of the system ( $AMR_{sys}$ ) in milligrams of total chromium per hour (mg/hr) using equation:

$$\Sigma VR_{inlet} \times EL \times 60 \text{ minutes/hour} = AMR_{sys}$$

where  $\Sigma VR_{inlet}$  is the total ventilation rate in dscm/min from the affected sources and EL is the applicable emission limitation from 40 C.F.R. 63.342 in mg/dscm. The allowable mass emission rate ( $AMR_{sys}$ ) calculated should be equal to or more than the outlet three-run average mass emission rate determined from Method 306 or 306A testing in order for the source to be in compliance with the standard.

<sup>c</sup> Special compliance provisions for multiple sources, performing different types of operations, and controlled by a common add-on air pollution control device (that may or may not also be controlling emissions from sources not affected by these standards) OR multiple sources, performing same types of operations, subject to different emission limits, and controlled by a common add-on air pollution control device:

(i) Calculate the cross-sectional area of each inlet duct, including those not affected by the standard

(ii) Determine the total sample time per test run by dividing the total inlet area from all tanks connected to the control system by the total inlet area for all ducts associated with the affected source, then multiple this number by two hours; this calculated time is the minimum sample time required per test run

(iii) Perform Method 306 or 306A testing and calculate an outlet mass emission rate

(iv) Determine the total ventilation rate from the affected sources by using equation:

$$VR_{tot} \times IDA_i / \Sigma IA_{total} = VR_{inlet,a}$$

where  $VR_{tot}$  is the average total ventilation rate in dscm/min for the three test runs as determined at the outlet by mass of the Method 306 or 306A testing;  $IDA_i$  is the total inlet duct area for all ducts conveying chromic acid from each type of affected source performing the same operation, or each type of affected source subject to the same emission limitation;  $\Sigma IA_{total}$  is the sum of all inlet duct areas from both affected and nonaffected sources; and  $VR_{inlet,a}$  is the total ventilation rate from all inlet ducts conveying chromic acid from each type of affected source performing the same operation, or each type of affected source subject to the same emission limitation.

(v) Establish the allowable mass emission rate in mg/hr for each type of affected source that is controlled by the add-on air pollution control device using the appropriate equation:

$$VR_{hc1} \times EL_{hc1} \times 60 \text{ minutes/hour} = AMR_{hc1}$$

$$VR_{hc2} \times EL_{hc2} \times 60 \text{ minutes/hour} = AMR_{hc2}$$

$$VR_{dc} \times EL_{dc} \times 60 \text{ minutes/hour} = AMR_{dc}$$

$$VR_{ca} \times EL_{ca} \times 60 \text{ minutes/hour} = AMR_{ca}$$

where  $hc$  applies to the total centilation rates for all hard chromium electroplating tanks subject to the same emission limitation;  $dc$  applies to the total of ventilation rates for the decorative chromium electroplating tanks;  $ca$  applies to the tlal of ventilation rates for the chromium anodizing tanks; and  $EL$  is the applicable emission limitation from 40 C.F.R. 63.342 in  $mg/dscm$ . There are two equations for hard chromium electroplating tanks because different emission limitations may apply (e.g., a new tank versus an existing, small tank).

(vi) Establish the allowable mass emission rate ( $AMR_{sys}$ ) in  $mg/hr$  for the system using the equation 8, including each type of affected source as appropriate:

$$AMR_{hc1} + AMR_{hc2} + AMR_{dc} + AMR_{ca} = AMR_{sys}$$

The allowable mass emission rate calculated from this equation should be equal to or more than the outlet three-run average mass emission rate determined from Method 306 or 306A testing in order for the source to be in compliance with the standards.

**Table 3**  
**Summary of Operation and Maintenance Practices**

Control Device	Work Practice Standards	Time Required
Composite Mesh Pad System	<ul style="list-style-type: none"> <li>5. Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.</li> <li>6. Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.</li> <li>7. Visually inspect ductwork from tank to the control device to ensure there are no leaks.</li> <li>8. Perform washdown of the composite mesh pads in accordance with manufacturer's recommendations.</li> </ul>	<ul style="list-style-type: none"> <li>5. 1/quarter</li> <li>6. 1/quarter</li> <li>7. 1/quarter</li> <li>8. Per manufacturer</li> </ul>
Packed Bed Scrubber System	<ul style="list-style-type: none"> <li>8. Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the backed beds, and no evidence of chemical attack on the structural integrity of the device.</li> <li>9. Visually inspect back portion of the chevron blade mist eliminator to ensure that it is dry and there is no breakthrough of chromic acid mist.</li> <li>10. Visually inspect ductwork from tank to the control device to ensure there are no leaks.</li> <li>11. Add fresh makeup water to the top of the packed bed. <sup>a,b</sup></li> </ul>	<ul style="list-style-type: none"> <li>2. 1/quarter</li> <li>12. 1/quarter</li> <li>13. 1/quarter</li> <li>14. Whenever makeup is added</li> </ul>
CMP/PBS System	Same as for CMP system	Same as for CMP system
Fiber-Bed Mist Eliminator <sup>c</sup>	<ul style="list-style-type: none"> <li>4. Visually inspect fiber-bed unit and prefiltered device to ensure there is proper drainage, no chromic acid buildup, and no evidence of chemical attack on the structural integrity.</li> <li>5. Visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks.</li> <li>6. Perform washdown of fiber elements in accordance with the manufacturer's recommendations.</li> </ul>	<ul style="list-style-type: none"> <li>5. 1/quarter</li> <li>6. 1/quarter</li> <li>7. 1/quarter</li> <li>8. Per manufacturer</li> </ul>
Other devices	To be proposed by the source for approval by the EPA.	To be proposed by the source
<b>Monitoring Equipment</b>		
Pilot Tube	Backflush with water, or remove from duct and rinse with fresh	1/quarter

	water. Replace and rotate 180 ° to the ensure same zero reading. Check pilot tube ends for damage, replace if cracked or fatigued.	
Stalagmometer	Follow manufacturer's recommendations.	

<sup>a</sup> If greater than 50 percent of the scrubber water is drained (e.g., for maintenance purposes), makeup water may be added to the scrubber basin.

<sup>b</sup> For horizontal-flow scrubbers, top is defined as the section of the unit directly above the packaging media such that the makeup water would flow perpendicular to the air flow through the packing. For vertical-flow units, the top is defined as the area downstream of the packing material such that the makeup water would flow countercurrent to the air flow through the unit.

<sup>c</sup> Work practice standards for the control device installed upstream of the fiber-bed mist eliminator to prevent plugging do not apply as long as the work practice standards for the fiber-bed unit are followed.

**Table 4**  
**Housekeeping Practices**

For	You must:	At this minimum frequency
1. Any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium.	a. Store the substance in a closed container in an enclosed storage area or building; and b. Use a closed container when transporting the substance from the enclosed storage area.	a. At all times, except when transferring the substance to and from the container. b. Whenever transporting the substance, except when transferring the substance to and from the container.
2. Each affected tank, to minimize spills of bath solution that result from dragout. Note: this measure does not require the return of contaminated bath solution to the tank. This requirement applies only as the parts are removed from the tank. Once away from the tank area, any spilled solution must be handled as in item 4.	a. Install drip trays that collect and return to the tank any bath solution that drips or drains from parts as the parts are removed from the tank; or b. Contain and return to the tank any bath solution that drains or drips from parts as the parts are removed; or c. Collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed.	a. Prior to operating the tank. b. Whenever removing parts from an affected tank. c. Whenever removing parts from an affected tank.
3. Each spraying operation for removing excess chromic acid from parts removed from, and occurring over, an affected tank.	Install a splash guard to minimize overspray during spraying operations and ensure that any hexavalent chromium laden liquid captured by the splash guard is returned to the electroplating or anodizing tank.	Prior to any such spraying operation.
4. Each operation that involves the handling or use of any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent	Begin cleanup, or otherwise contain, all spills of the substance. Note: substances that fall or flow into drip trays, pans, sumps, or other containment areas are not considered spills.	Within 1 hour of the spill.

chromium.		
5. Surfaces within the enclosed storage area, open floor area, walkways around affected tanks contaminated with hexavalent chromium from an affected chromium electroplating or chromium anodizing tank.	a. Clean the surfaces using one or more of the following: HEPA vacuuming; hand-wiping with a damp cloth; wet mopping; hose down or rise with potable water that is collected in a wastewater collection system; other cleaning method approved by the permitting authority; or b. Apply a non-toxic chemical dust suppressant to the surfaces.	a. At least once every 7 days if one or more electroplating or anodizing tanks were used, or at least after every 40 hours of operation of one or more affected electroplating or anodizing tanks, whichever is later. b. According to manufacturer's recommendations.
6. All buffing, grinding, or polishing operations located in the same room as electroplating or anodizing operations.	Separate the operation from any affected electroplating or anodizing operation by installing a physical barrier; the barrier may take the form of plastic strip curtains.	Prior to beginning the buffing, grinding, or polishing operation.
7. All chromium or chromium-containing wastes generated from housekeeping activities.	Store, dispose, recover, or recycle the wastes using practices that do not lead to fugitive dust and in accordance with hazardous waste requirements.	At all time.