

Plating and Polishing Operations

40 Code of Federal Regulations (CFR) Part 63 Subpart WWWWWW (6W)

Summary of Requirements: Dry Mechanical Polishing

The following requirements shall be followed in addition to the general summary of requirements, if the facility owns or operates affected new or existing **DRY MECHANICAL POLISHING EQUIPMENT** that has the **potential to emit** one or more PPMHAP.

Dry Mechanical Polishing is defined as a process used for removing defects from and smoothing the surface of finished metals and formed products after plating with any of the PPMHAP using hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles.

MANAGEMENT PRACTICES

- Operate a capture system for PM emissions from the polishing operation **and** exhaust them to a cartridge, fabric filter or High Efficiency Particulate Air (HEPA) filter according to the following guidelines:
 - Operate all capture and control devices according to the manufacturer's specifications and operating instructions.
 - Keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

COMPLIANCE DEMONSTRATION

Initial Compliance

- Demonstrate initial compliance with the following requirements:
 - Comply with the management practices;
 - Submit Notification of Compliance Status stating that you have installed and are operating the control system according to the manufacturer's specification and instructions;
 - Follow the manufacturer's specifications and operating instructions at all times;

Continuous Compliance

- Demonstrate continuous compliance with the following requirements:
 - Comply with the management practices;
 - Operate and maintain air pollution control equipment
 - Take immediate corrective action following any malfunction of the control equipment or capture system;
 - Prepare an annual compliance report and certify that manufacturer's specifications and instructions have been followed;
 - Record results of all control system inspections, deviations from proper operation, and corrective actions.

Please refer to the full rule text of 40 CFR Part 63, Subpart WWWWWW (available at <http://www.epa.gov/ttn/atw/area/compilation.html>) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule.

Additional information is available at <http://www.iowadnr.gov/air/prof/NESHAP/>

For more information or questions please contact:
Iowa Department of Natural Resources: **1-877-AIR-IOWA**
Iowa Waste Reduction Center: **1-800-422-3109**

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