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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



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Dear Chromium Electroplating and/or Chromium Anodizing Facility:

The National Emission Standard for Hazardous Air Pollutants (NESHAP) for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks final rule was promulgated on January 25, 1995. The final rule is found in the Federal Register notice published January 25, 1995 (pages 4948-4993).

Enclosed are reporting and recordkeeping forms developed by the Michigan Department of Environmental Quality's (DEQ's) Environmental Science and Services Division (ESSD), Clean Air Assistance Program. Facilities who properly complete, submit, and maintain on-site the enclosed forms can be assured that they are complying with all of the final rule's reporting and recordkeeping requirements. These forms were developed as guidance documents to assist facilities subject to the final rule's compliance requirements. Affected facilities may elect to use alternative reporting and recordkeeping forms that satisfy the provisions of the final rule.

Reporting Forms

Affected facilities must submit all reports to the appropriate district office of the DEQ, Air Quality Division (AQD), except area sources completing the "Ongoing Compliance Status Report." Area sources in compliance with the standard should retain this report on-site and make it available upon request to the AQD.

Notification of Construction/Reconstruction Report

This report should be completed each time you install a new or reconstruct an existing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing tank(s).

Notification of Performance Test Report

All facilities subject to the NESHAP final rule must conduct an initial performance test to demonstrate compliance with the emission limit. However, facilities meeting one of the following criteria are not required to perform a test or file the "Notification of Performance Test Report:"

- A chromium electroplating tank or chromium anodizing tank that uses a wetting agent to maintain surface tension of 45 dynes/cm or less using a stalagmometer and 35 dynes/cm or less using a tensiometer.
- A decorative chromium electroplating tank using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient.

Performance tests for new or reconstructed chromium plating or anodizing tanks must be conducted within 120 days from startup. This report must be submitted to the AQD at least 60 days prior to the performance test.

Performance Test Results Report

During testing, affected facilities are required to establish operating parameters (e.g., pressure drop, velocity pressure, and foam blanket thickness) that correspond to compliance with the chromium emission limit. This report must be submitted no later than 90 days after the performance test. The test results must be submitted to the AQD along with the "Notification of Compliance Status Report."

Notification of Compliance Status Report

Data supporting compliance with the affected facility's chromium emission limit must be included in this report. Facilities must submit the report within 90 days following the performance test.

Ongoing Compliance Status Report

This summary report documents the ongoing compliance status of the affected facility. All affected facilities must file this report, except for facilities operating a decorative chromium electroplating tank(s) using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient. Major sources must submit these reports to the AQD semi-annually or quarterly if exceedances occur. Area sources must keep the report on-site and complete it annually or semi-annually if exceedances occur.

Recordkeeping Forms

Affected facilities must keep records of inspections and maintenance of equipment, malfunctions, corrective actions taken, monitoring data, and hours of tank operation. All records should be maintained for at least five (5) years. Facilities operating a decorative chromium electroplating tank(s) using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient have only one recordkeeping requirement: to maintain records of bath components purchased with the wetting agent clearly identified as a bath constituent contained in one of the components. The following forms were developed for all other affected facilities.

Operation and Maintenance Record

Facilities using one or more of the following control systems to comply with the chromium emission limit must keep records of inspections, maintenance, and malfunctions of the systems:

- Packed-bed scrubber
- Composite mesh-pad system or combination packed-bed scrubber/composite mesh-pad system
- Fiber-bed mist eliminator

Monitoring Data Record

Affected facilities use this form to record the daily pressure drop across the control systems and the daily velocity pressure at the inlet of the packed-bed scrubbers.

Daily Process Operations Record

All affected facilities, except for decorative chromium electroplating tank(s) using a trivalent chromium bath that incorporates a wetting agent as a bath ingredient must record the hours of tank operation. Also, for those facilities demonstrating that they are small hard chromium electroplating facilities, this form can be used to record the actual rectifier usage (amp-hrs).

Fume Suppressant Daily Process Operations Record

These forms can be used to document the dates and times that wetting agents were added to the plating baths. The forms are also used to record the surface tension. One is for measuring surface tension with a stalagmometer, the other with a tensiometer.

NOTE: If a combination control device and fume suppressant system is used and both are needed to comply with the chromium emission limit, complete the appropriate "Operation and Maintenance Record, Monitoring Data Record, and the Fume Suppressant Daily Process Operations Record." If a combination control device and fume suppressant system is used and only one is needed to comply with the chromium emission limit, only fill out the records associated with the control system used to achieve compliance.

Operation and Maintenance Plan

In addition to the reporting and recordkeeping requirements, all affected facilities (except for decorative electroplating facilities using trivalent chromium bath that incorporates a wetting agent as a bath ingredient) must comply with work practice standards. An Operation and Maintenance Plan is an essential element of the work practice standards. This plan should include a checklist to document the operation and maintenance of tanks, add-on air pollution control devices, and monitoring equipment; procedures to be following to ensure that equipment malfunctions due to poor maintenance do not occur; and procedures for identifying malfunctions of equipment and implementing corrective actions.

Summary

These reporting and recordkeeping forms only contain the minimum requirements of the final rule and do not include all of the documentation necessary to ensure compliance. Information that can be used to complete the Operation and Maintenance Plan include vendor consultations, any applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, and/or U.S. Environmental Protection Agency guidance manuals. If you have questions regarding these reporting and recordkeeping forms, please contact the Clean Air Assistance Program at 1-800-662-9278.

Clean Air Assistance Program
Environmental Science and Services Division
Michigan Department of Environmental Quality
1-800-662-9278