

**ASSIGNMENT**  
to  
**GENERAL AIR CONTAMINANT DISCHARGE PERMIT**

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
(541) 736-1056

**PERMITTEE:**

Quality Metal Finishing  
240 East 15<sup>th</sup> Street  
Eugene, Oregon 97401

**INFORMATION RELIED UPON:**

Application No.: 56383  
Date Received: June 21, 2011

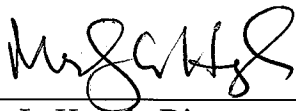
**PLANT SITE LOCATION:**

1260 Wallis Street  
Eugene, Oregon 97402

**LAND USE COMPATIBILITY  
STATEMENT:**

Approving Authority: City of Eugene  
Date: March 13, 2001

**ASSIGNMENT:** The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060(2) and based on the land use compatibility findings included in the permit record (note: land use compatibility statements are not applicable to portable sources).



Merlyn L. Hough, Director

NOV - 2 2011

Dated

**General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:**

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-026a	09/02/2021	Plating and polishing operations subject to an Area Source NESHAP (Title 37, Table 1, Part B, 82)	3471

**SUPPLEMENTAL INFORMATION:**

<b>Facility contact:</b>		
Name:	Mike Lowden	
Phone number:	541-343-4534	
Facsimile number:	541-484-9366	
e-mail address:	<a href="mailto:m_lowden@msn.com">m_lowden@msn.com</a>	
<b>Permit Summary:</b>		
Source Test Requirement	No	NA
NSPS (40 CFR Part 60)	No	NA
NESHAP (40 CFR Part 63)	Yes	Subpart WWWW
<b>Reports Required:</b>		
Annual	Yes	Ongoing compliance monitoring reports and exceedance reports kept onsite.
NSPS	No	NA
NESHAP	Yes	Ongoing compliance monitoring reports and exceedance reports kept onsite.
Other	No	NA
Public Notice	Category I	
<b>Application review report:</b>		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

**GENERAL**  
**AIR CONTAMINANT DISCHARGE PERMIT**

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
Telephone: (541) 736-1056

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**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**

Signature on file

September 2, 2011

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Merlyn L. Hough, Director

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Dated

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<b>Title 37, Table 1</b>	<b>Source Category Description</b>	<b>NAICS</b>
Part B, 82	Plating and polishing operations including electroplating, non-electrolytic plating, non-electrolytic metal coating processes, thermal spraying, dry mechanical polishing, electroforming, and electropolishing, subject to 40 CFR part 63 subpart WWWW, as adopted under LRAPA Title 44.	332116, 332722, 332811, 332812, 332813, 332913, 332999, 323111, 334412, 336412, 339911

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### 1.0 PERMIT ASSIGNMENT

- 1.1. Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing plating and polishing activities listed on the cover page of this permit, including supporting activities.
  - b. The plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal hazardous air pollutants (HAP), which means any compound of the following metals: cadmium, chromium, lead, manganese, and nickel. With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.
  - c. A Simple or Standard ACDP is not required for the source.
  - d. The source is not having ongoing, recurring or serious

compliance problems.

**1.2. Exclusions**

This permit does not apply to any of the following process units or operations:

- a. Process units that are subject to the requirements of 40 CFR part 63 subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).
- b. Research and development process units.
- c. Process units that are used strictly for educational purposes.
- d. Thermal spraying conducted to repair surfaces.
- e. Dry mechanical polishing conducted to restore the original finish to a surface.
- f. Any plating or polishing process that does not use any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material.

**1.3. Assignment**

LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with the LRAPA's Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment of the permittee no longer meets the requirements of this permit.

**1.4. Permitted Activities**

This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Simple or Standard Permit or General ACDP Attachments, if applicable.

**1.5. Relation to local land use laws**

This permit is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

## **2.0 GENERAL EMISSION STANDARDS AND LIMITS**

- 2.1. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions by:
- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
  - b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
  - c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- 2.2. Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.3. Nuisance and Odors** The permittee must not allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by LRAPA personnel.

## **3.0 COATING OPERATION AND MAINTENANCE**

- 3.1. NESHAP Compliance date** An existing affected source must achieve compliance no later than July 1, 2010. A new affected source must achieve compliance no later than July 1, 2008 or upon initial startup, whichever is later.
- 3.2. Non-Cyanide Electroplating, Electroforming, or Electropolishing Tank** For each affected non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an "electrolytic" process tank) that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, the permittee must comply with the Condition 3.2a, 3.2b, or 3.2c, as practicable.
- a. The permittee must use a wetting agent/fume suppressant in the bath of the affected tank as follows:
    - i. The permittee must initially add the wetting agent/fume suppressant in the amounts

- recommended by the manufacturer for the specific type of electrolytic process.
- ii. The permittee must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, or in proportions such that the bath contents are returned to that of the original makeup of the bath.
  - iii. If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.
- b. The permittee must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, as follows:
- i. The permittee must operate all capture and control devices according to the manufacturer's specifications and operating instructions.
  - ii. The permittee must 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.
- c. The permittee must cover the tank surface according to Condition 3.2.c.i or 3.2.c.ii.
- i. For batch electrolytic process tanks, the permittee must use a tank cover over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.
  - ii. For continuous electrolytic process tanks, the permittee must cover at least 75 percent of the surface of the tank whenever the electrolytic process tank is in operation.

**3.3. Flash or Short-Term Electroplating Tank**

For each "flash" or short-term electroplating tank that uses or emits one or more of the plating and polishing metal HAP, the permittee must comply with the requirements specified in Condition 3.3a or 3.3b, and implement the applicable management practices in Condition 3.8, as practicable.

- a. The permittee must limit short-term or "flash"

electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

- b. The permittee must use a tank cover for at least 95 percent of the plating time.

**3.4. Process Tank Used for Short-Term Electroplating and for Electrolytic Processing of Longer Duration**

For each process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that is not short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, the permittee must meet the requirements specified in Condition 3.2 or 3.3, whichever apply to the process operation, and implement the applicable management practices in Condition 3.8, as practicable.

**3.5. Electroplating Tank That Uses Cyanide**

For each electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, the permittee must comply with the following requirements:

- a. The permittee must measure and record the pH of the tank upon start-up of the bath. No additional pH measurements are required.
- b. The permittee must implement the applicable management practices in Condition 3.8, as practicable.

**3.6. Dry Mechanical Polishing Machine**

For each dry mechanical polishing machine that emits one or more of the plating and polishing metal HAP, the permittee must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to the following:

- a. The permittee must operate all capture and control devices according to the manufacturer's specifications and operating instructions.
- b. The permittee must 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.

**3.7. Thermal Spraying Operation**

For each thermal spraying operation that applies one or more of the plating and polishing metal HAP, the permittee must meet the following applicable requirements, and the applicable management practices in Condition 3.8.

- a. For existing permanent thermal spraying operations, the permittee must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a water curtain, fabric filter, cartridge, or HEPA filter, according to the following:

- i. The permittee must operate all capture and control devices according to the manufacturer's specifications and instructions.
    - ii. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
  - b. For new permanent thermal spraying operations, the permittee must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric, cartridge or HEPA filter, according to the following:
    - i. The permittee must operate all capture and control devices according to the manufacturer's specifications and instructions.
    - ii. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
  - c. For temporary thermal spraying operations, the permittee must meet the following applicable requirements:
    - i. The permittee must document the amount of time the thermal spraying occurs each day, and where it is conducted.
    - ii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.

**3.8. Plating and  
Polishing Process  
Unit**

For each plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, the permittee must implement the following applicable management practices, as practicable.

- a. Minimize bath agitation when removing any parts processed in the tank, except when necessary to meet part quality requirements.
- b. Maximize the draining of bath solution back into the tank, 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.
- c. 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).
- d. Use tank covers, if already owned and available at the facility.

- e. Minimize or reduce heating of process tanks, when doing so would not interrupt production or adversely affect part quality.
- f. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources.
- g. 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 pretreated parts to be plated.
- h. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks.
- i. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns.
- j. Minimize spills and overflow of tanks.
- k. Use squeegee rolls in continuous or reel-to-reel plating tanks.
- l. Perform regular inspections to identify leaks and other opportunities for pollution prevention.

**3.9. Startup, Shutdown, and Malfunction Provisions**

At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the permittee must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.

## 4.0 COMPLIANCE DEMONSTRATION

- 4.1. **Continual Compliance** The permittee must be in compliance with the applicable management practices and equipment standards in this permit at all times.
- 4.2. **Initial Compliance Demonstration** To demonstrate initial compliance, the permittee must satisfy the following requirements:
- a. For each electrolytic process tank that contains one or more of the plating and polishing metal HAP, is subject to the requirements in Condition 3.2, and uses a wetting agent/fume suppressant to comply, the permittee must demonstrate initial compliance as follows:
    - i. The permittee must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.
    - ii. The permittee must state in the Notification of Compliance Status that wetting agent/fume suppressant is added to the bath according to manufacturer's specifications and instructions.
    - iii. The permittee must implement the applicable management practices specified in Condition 3.8 as practicable.
    - iv. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.
  - b. For each electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP, is subject to the requirements in Condition 3.2, and uses a control system to comply, the permittee must demonstrate initial compliance as follows:
    - i. The permittee must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.
    - ii. The permittee must state in the Notification of Compliance Status that the control system has been installed according to the manufacturer's specifications and instructions.

- iii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - iv. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.
  - v. The permittee must follow the manufacturer's specifications and operating instructions for the control systems at all times.
- c. For each batch electrolytic process tank that contains one or more of the plating and polishing metal HAP, which is subject to the requirements in Condition 3.2, and using a tank cover to comply, the permittee must demonstrate initial compliance as follows:
- i. The permittee must install a tank cover on the affected tank.
  - ii. The permittee must state in the Notification of Compliance Status that the tank is operated with the cover in place at least 95 percent of the electrolytic process operating time.
  - iii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - iv. The permittee must state in your Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.
- d. For each continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP, is subject to the requirements in Condition 3.2, and the tank surface is covered to comply, the permittee must demonstrate initial compliance as follows:
- i. The permittee must cover at least 75 percent of the surface area of the affected tank.
  - ii. The permittee must state in the Notification of Compliance Status that the tank is operated with the surface cover in place whenever the continuous electrolytic process is in operation.
  - iii. The permittee must implement the applicable

management practices specified in Condition 3.8, as practicable.

- iv. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.
- e. For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP, is subject to the requirements in Condition 3.3, and compliance is achieved by limiting the plating time of the affected tank, the permittee must demonstrate initial compliance as follows:
  - i. The permittee must state in the Notification of Compliance Status that short-term or flash electroplating is limited to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.
  - ii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - iii. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.
- f. For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP, is subject to the requirements in Condition 3.3, and complies by operating the affected tank with a cover, the permittee must demonstrate initial compliance as follows:
  - i. The permittee must install a tank cover on the affected tank.
  - ii. The permittee must state in the Notification of Compliance Status that the tank is operated with the cover in place at least 95 percent of the plating time.
  - iii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - iv. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been

implemented, as practicable.

- g. For each tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in Condition 3.5, the permittee must demonstrate initial compliance as follows:
  - i. The permittee must report in the Notification of Compliance Status the pH of the bath solution that was measured at start-up, according to the requirements of Condition 3.5a.
  - ii. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - iii. The permittee must state in the Notification of Compliance Status the applicable management practices specified in specified in Condition 3.8 have been implemented, as practicable.
- h. For each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in Condition 3.6, the permittee must demonstrate initial compliance as follows:
  - i. The permittee must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.
  - ii. The permittee must state in the Notification of Compliance Status that the control system has been installed according to the manufacturer's specifications and instructions.
  - iii. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- i. For each existing permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in Condition 3.7a, the permittee must demonstrate initial compliance according to the following:
  - i. The permittee must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water

- curtain, or a cartridge, fabric filter, or HEPA filter.
- ii. The permittee must state in the Notification of Compliance Status that the control system is installed and operating according to the manufacturer's specifications and instructions.
  - iii. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- j. For each new permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in Condition 3.7b, the permittee must demonstrate initial compliance as follows:
- i. The permittee must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a cartridge, fabric or HEPA filter.
  - ii. The permittee must state in the Notification of Compliance Status that the control system is installed and operated according to the manufacturer's specifications and instructions.
  - iii. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- k. For each temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in Condition 3.7c, the permittee must demonstrate initial compliance as follows:
- i. The permittee must implement the applicable management practices specified in Condition 3.8, as practicable.
  - ii. The permittee must state in the Notification of Compliance Status that the applicable management practices specified in Condition 3.8 have been implemented, as practicable.

**4.3. Continuous Compliance Demonstration**

To demonstrate continuous compliance with the applicable management practices and equipment standards, the permittee must satisfy the following requirements:

- a. The permittee must prepare an annual compliance certification according to the requirements specified in Condition 6.3 and keep it in a readily-accessible location for inspector review.
- b. For each electrolytic process tank using a wetting agent/fume suppressant to comply, the permittee must demonstrate continuous compliance as follows:
  - i. The permittee must record that the wetting agent/fume suppressant was added to the tank bath in the original make-up of the tank.
  - ii. For tanks where the wetting agent/fume suppressant is a separate ingredient from the other tank additives, the permittee must demonstrate continuous compliance as follows:
    - The permittee must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank; or in proportion such that the bath is brought back to the original make-up of the tank.
    - The permittee must record each addition of wetting agent/fume suppressant to the tank bath.
  - iii. The permittee must state in the annual compliance certification whether the wetting agent/fume suppressant was added to the bath according to the manufacturer's specifications and instructions.
- c. For each electrolytic process tank using a control system to comply; an affected dry mechanical polishing operation that is subject to Condition 3.6; or an affected thermal spraying operation that is subject to Condition 3.7a or 3.7b; the permittee must demonstrate continuous compliance as follows:
  - i. The permittee must operate and maintain the control system according to the manufacturer's specifications and instructions.
  - ii. Following any malfunction or failure of the capture or control devices to operate properly, the permittee must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

- iii. The permittee must state in the annual certification that whether you have operated and maintained the control system according to the manufacturer's specifications and instructions.
  - iv. The permittee must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.
  - v. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- d. For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in Condition 3.2c and complying by limiting the plating time for the affected tank, the permittee must demonstrate continuous compliance as follows:
- i. The permittee must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
  - ii. The permittee must record the times that the affected tank is operated each day.
  - iii. The permittee must state in the annual compliance certification whether you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
- e. For each batch electrolytic process tank that is subject to the requirements of Condition 3.2 or a flash or short-term electroplating tank that is subject to the requirements in Condition 3.3 and complying by operating the affected tank with a cover, the permittee must demonstrate continuous compliance as follows:
- i. The permittee must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.
  - ii. The permittee must record the times that the tank is operated and the times that the tank is covered on a daily basis.

- iii. The permittee must state in the annual certification whether the tank has been operated with the cover in place at least 95 percent of the electrolytic process time.
- f. For each continuous electrolytic process tank that, is subject to the requirements in Condition 3.2, and complies using tank covers, the permittee must demonstrate continuous compliance as follows:
  - i. The permittee must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.
  - ii. The permittee must state in the annual certification whether the tank has operated with 75 percent of the surface covered during all periods of electrolytic process operation.
- g. For each tank or other operation that is subject to the management practices specified in Condition 3.8, the permittee must demonstrate continuous compliance as follows:
  - i. The permittee must implement the applicable management practices during all times that the affected tank or process is in operation.
  - ii. The permittee must state in the annual compliance certification whether the applicable management practices have been implemented, as practicable.

## **5.0 RECORDKEEPING REQUIRMENTS**

### **5.1. General Compliance and Applicability Records**

The permittee must keep the following records.

- a. A copy of any Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications.
- b. The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards.
- c. The occurrence and duration of each malfunction of

operation (*i.e.*, process equipment) or the required air pollution control and monitoring equipment.

- d. All required maintenance performed on the air pollution control and monitoring equipment.
- e. The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in Condition 4.3.

**5.2. Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA Title 36 upon occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60 minute period.

**5.3. Retention of Records** The permittee must maintain files of all information (including all reports and notifications) required by this permit in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

**5.4. Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

## **6.0 REPORTING REQUIREMENTS**

- 6.1. Initial Notification** The permittee must submit an Initial Notification by the dates specified. A form for this purpose is available from LRAPA. The notification must be sent to the LRAPA address, as listed in Condition 7.2.
- a. For a facility that started up on or before July 1, 2008, the permittee must submit an Initial Notification prior to assignment to this permit.
  - b. For a facility that starts up after July 1, 2008, the permittee must submit an Initial Notification when you become subject.

**6.2. Notification of Compliance Status** The permittee must submit a Notification of Compliance Status before the close of business on the compliance date specified in Condition 3.1. A form for this purpose is available from LRAPA. The notification must be sent to the LRAPA office, as listed in Condition 7.2.

- a. The permittee must submit an amended Notification of Compliance Status within 30 days of any change to the information submitted according to Condition 6.2 that does not result in excess emissions.

**6.3. Annual Certification of Compliance Report** The permittee must prepare an annual certification of compliance report. These reports do not need to be submitted unless a deviation from the requirements of this permit has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

- a. For each electrolytic process tank that is subject to the requirements in Condition 3.2a, the permittee must state in the annual compliance certification whether wetting agent/fume suppressant has been added to the bath according to the manufacturer's specifications and instructions.
- b. For each of the following source(s), the permittee must state in the annual certification whether the control system has been operated according to the manufacturer's specifications and instructions.
  - i. Electrolytic process tank that is subject to the requirements in Condition 3.2 and a control system is used to comply.
  - ii. Dry mechanical polishing operation that is subject to Condition 3.6.
  - iii. Permanent thermal spraying operation that is subject to Condition or 3.7a or 3.7b.
- c. For each flash or short-term electroplating tank that is subject to the requirements in Condition 3.3 and is complying by limiting the plating time of the affected tank, the permittee must state in the annual compliance certification – whether short term or flash electroplating has been limited to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.
- d. For each batch electrolytic process tank that is subject to the requirements in Condition 3.2 or a flash or short-term

electroplating tank that is subject to the requirements in Condition 3.3 and is complying by operating the affected tank with a cover, the permittee must state in the annual certification whether the tank has been operated with the cover in place at least 95 percent of the electrolytic process time.

- e. For each continuous electrolytic process tank that is subject to the requirements of Condition 3.2 and is complying by operating the affected tank with a cover, the permittee must state in the annual certification whether at least 75 percent of the surface area of the tank has been covered during all periods of electrolytic process operation.
- f. For each tank or other affected plating and polishing operation that is subject to the management practices specified in Condition 3.8, the permittee must state in the annual compliance certification whether the applicable management practices have been implemented, as practicable.
- g. Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

**6.4. Deviation Report**

If any deviations from the compliance requirements specified in this permit occurred during the year, the permittee must report the deviations, along with the corrective action taken, and submit this report to LRAPA.

**6.5. Excess Emissions**

The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 7.2.
- b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

- c. The permittee must also submit follow-up reports when required by LRAPA.
- 6.6. Initial Startup Notice** The permittee must notify LRAPA in writing of the date a new facility is started up. The notification must be submitted no later than seven (7) days after startup.
- 6.7. Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.
- 6.8. Construction or Modification Notices** The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval before:
- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
- b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
- c. Making any physical change which increases emissions; or
- d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.
- 6.9. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 7.2.

## **7.0 ADMINISTRATIVE REQUIREMENTS**

- 7.1. Reassignment to the General ACDP** A complete application for reassignment to this permit is due within 60 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued.
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is reissued and the source is reassigned to the permit.
- b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee

must continue to comply with the General ACDP until LRAPA takes final action on the Simple or Standard ACDP application.

- c. If a complete application for reassignment to the General ACDP or Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

**7.2. Permit Coordinator Address** All reports, notices, and applications should be directed to LRAPA as follows:  
Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
541-736-1056

**7.3. LRAPA's web site** Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at [www.lrapa.org](http://www.lrapa.org).

## **8.0 FEES**

**8.1. Annual Compliance Fee** The annual fee specified in LRAPA 37-0020, Table 2, Part 2 for a General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to this date.

**8.2. Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in LRAPA 37-0020, Table 2, Part 3.a is due with an application for changing the ownership or the name of the company.

**8.3. Special Activity Fees** The special activity fees specified in LRAPA 37-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.

**8.4. Where to Submit Fees** Fees must be submitted to:  
Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, Oregon 97477

## **9.0 GENERAL CONDITIONS AND DISCLAIMERS**

**9.1. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

- 9.2. **Conflicting Conditions**            In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 9.3. **Masking of Emissions**        The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 9.4. **LRAPA Access**                The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 9.5. **Permit Availability**            The permittee must have a copy of the permit available at the facility at all times.
- 9.6. **Open Burning**                The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 9.7. **Asbestos**                      The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 9.8. **Property Rights**                The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 9.9. **Termination, Revocation, or Modification**            LRAPA may modify or revoke this permit pursuant to LRAPA 37-0082 and 37-0084.

**10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS**

ACDP	Air Contaminant Discharge Permit	Cr	Chromium
calendar year	The 12-month period beginning January 1st and ending December 31st	DEQ	Oregon Department of Environmental Quality
Cd	Cadmium	EPA	US Environmental Protection Agency
CFR	Code of Federal Regulations	HAP	Hazardous Air Pollutant as defined LRAPA Title 44

LRAPA	Lane Regional Air Protection Agency	Ni	Nickel
metal HAP	Cadmium, chromium, nickel, manganese, and lead	OAR	Oregon Administrative Rules
Mn	Manganese	ORS	Oregon Revised Statutes
MSDS	material safety data sheet	Pb	lead
NAICS	North American Industry Classification System	SIC	Standard Industrial Code
NESHAP	National Emissions Standards for Hazardous Air Pollutants	target HAP	Cadmium, chromium, nickel, manganese, and lead
		year	A period consisting of any 12-consecutive calendar months

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AQGP-026 plating and polishing general acdp.docx

Lane Regional Air Protection Agency

**GENERAL  
AIR CONTAMINANT DISCHARGE PERMIT  
ASSESSMENT REPORT**

**PLATING AND POLISHING**

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from plating and polishing operations subject to the Plating and Polishing Operations NESHAP (40 CFR part 63 subpart WWWW). The Plating and Polishing Operations NESHAP regulates facilities engaged in one or more of the following operations that uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of the following metals: cadmium, chromium, lead, manganese, and nickel. With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.
  - Electroplating other than chromium electroplating (i.e., nonchromium electroplating)
  - Electroless or non-electrolytic plating
  - Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying
  - Dry mechanical polishing of finished metals and formed products after plating
  - Electroforming
  - Electropolishing
  
2. This General Permit does not apply to:
  - Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)
  - Research and development process units, as defined in 40 CFR 63.11511
  - Process units that are used strictly for educational purposes
  - Thermal spraying conducted to repair surfaces; dry mechanical polishing conducted to restore the original finish to a surface to apply to restoring the original finish
  - Any plating or polishing process that does not use any material that contains

cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material

3. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.
4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.
5. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

#### ASSESSMENT OF EMISSIONS

6. Facilities assigned to this General Permit are sources of particulate matter (PM) and hazardous air pollutant (HAP) emissions.
7. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of LRAPA Title 12.

#### SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA Title 32 and 48. The permit contains requirements and limitations to ensure compliance with these standards.
9. Facilities assigned to this General Permit are subject to 40 CFR part 63 subpart WWWW as adopted in LRAPA Title 44. The permit contains requirements and limitations to ensure compliance with these standards. The following table lists the permit conditions that implement 40 CFR part 63 subpart WWWW.

#### COMPLIANCE ASSURANCE

10. Permittees are required to maintain records of notifications, production, compliance, work practice activities, and complaints received at the facility. These items are reported to LRAPA annually, as applicable.

11. LRAPA staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

#### REVOCAION OF ASSIGNMENT

12. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

#### PUBLIC NOTICE

13. General Air Contaminant Discharge Permits are incorporated into LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period in different locations throughout the state. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. LRAPA will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the LRAPA Director.

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