

**ASSIGNMENT**

to

**GENERAL AIR CONTAMINANT DISCHARGE PERMIT**

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

**PERMITTEE:**

Northwest Industrial Chrome  
1360 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

**INFORMATION RELIED UPON:**

Application No.: 64524  
Date Received: November 26, 2018

**PLANT SITE LOCATION:**

1360 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

**LAND USE COMPATIBILITY  
STATEMENT:**

Approving Authority: City of Eugene  
Approval Date: April 29, 2002

PERMITTEE ALSO ASSIGNED TO THE  
GENERAL ACDP ATTACHMENT:  
AQGP-026a for Plating and Polishing

**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.



Merlyn L. Hough, Director

**JAN 3 2019**

Dated

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

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-001	10/11/2028	Hard chrome platers (LRAPA 37-0020, Table 1, Part B, 20)	3471

**SUPPLEMENTAL INFORMATION:**

<b>Facility contact:</b>		
Name:	Tim Jablonski (or Mack Carr)	
Title:	Owner (or Lead Plater)	
Phone number:	(541) 359-7635 (or 541-729-1741)	
e-mail address:	timjabo@msn.com	
<b>Permit Summary:</b>		
Source Test Requirement	Yes	Once during permit term (by 10/11/28) – See Condition 5.2
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subparts N and WWWW
<b>Reports Required:</b>		
Annual	Yes	Due February 15
NSPS	No	N/A
NESHAP	Yes	Source Test Results
Other	No	N/A
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  
(541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060

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

  
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Merlyn L. Hough, Director

OCT 11 2018

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Dated

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Table 1 Code	Source Description	SIC	NAICS
Part B, 20	Chromium electroplaters using <b>hard chromium electroplating tanks</b> subject to Part 63, Title 40 of Code of Federal Regulations, Subpart N as adopted under LRAPA 44-150.	3471	332813

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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 hard chromium electroplating as listed on the cover page of this permit, including supporting activities.
  - b. A Simple or Standard ACDP is not required for the source.
  - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with LRAPA's Rules and Regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of LRAPA Title 37, Section 37-0060 and the conditions of this permit.
- 1.3 Permitted Activities** The permittee is allowed 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 the permittee complies with the conditions of this permit. 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 ACDP or General ACDP Attachment(s), if applicable.
- 1.4 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 Department of Environmental Quality for any necessary permits at (503) 229-5696. 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 Visible Emissions** The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources, as applicable. The visible emissions limitation in this condition is based upon a period or periods aggregating more than three-minutes in any one hour. Observations shall be recorded at 15-second intervals as specified in LRAPA 32-010(2). Opacity

must be measured as a three-minute aggregate period using EPA Method 203B, a continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60, or an alternative monitoring method approved by LRAPA that is equivalent to EPA Method 9.

- a. Emissions from any air contaminant source installed, constructed, or modified before June 1, 1970, must not equal or exceed:
  - i. 40% opacity through December 31, 2019; and
  - ii. 20% opacity on or after January 1, 2020.

**2.2 Particulate Matter Emissions**

The permittee must comply with the following particulate matter emission limits, as applicable:

- a. Particulate matter emissions from any air contaminant source installed, constructed or modified before June 1, 1970 other than fuel burning equipment and fugitive emission sources must not exceed:
  - i. 0.24 grains per standard cubic foot, prior to December 31, 2019; and
  - ii. 0.15 grains per dry standard cubic foot on or after January 1, 2020.
- b. Particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but before April 16, 2015 other than fuel burning equipment and fugitive emission sources must not exceed 0.14 grains per dry standard cubic foot.
- c. Particulate matter emissions from any air contaminant source installed, constructed or modified on or after April 16, 2015 other than fuel burning equipment and fugitive emission sources must not exceed 0.10 grains per dry standard cubic foot.
- d. Particulate matter emissions from equipment or a mode of operation installed, constructed or modified before June 1, 1970 other than fuel burning equipment and fugitive emission sources that is used less than 876 hours per calendar year must not exceed:
  - i. 0.24 grains per standard cubic foot from April 16, 2015 through December 31, 2019; and
  - ii. 0.20 grains per dry standard cubic foot on or after January 1, 2020.

- e. Particulate matter emissions from any fuel burning equipment installed, constructed, or modified before June 1, 1970 must not exceed:
  - i. 0.24 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air prior to December 31, 2019; and
  - ii. 0.15 grains per dry standard cubic foot corrected to 12% CO<sub>2</sub> or 50% excess air on or after January 1, 2020.
- f. Particulate matter emissions from any fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but before April 16, 2015 must not exceed 0.14 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air.
- g. Particulate matter emissions from any fuel burning equipment installed, constructed, or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air.
- h. Non-fugitive particulate matter emissions from any process must not exceed the amount shown in LRAPA 32-8010 for the process weight allocated to such a process.

**2.3 Fugitive Emissions**

The permittee must take reasonable precautions at all times to prevent fugitive dust emissions, as measured by EPA Method 22, by:

- a. Using, where possible, water or chemicals for control of dust in the demolition of existing buildings and structures, construction operations, the grading of roads or clearing of land;
- b. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
- c. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
- d. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- e. Installing adequate containment during sandblasting or other similar operations;
- f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;

- g. Promptly removing earth or other material that does or may become airborne from paved streets; and
  - h. Developing an LRAPA approved fugitive emission control plan upon request by LRAPA if the above precautions are not adequate and implementing the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
- 2.4 **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.
- 2.5 **Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. The creation of nuisance conditions may, in addition to other action LRAPA may take, result in rescinding assignment to the permit and the permittee will be required to obtain a Simple or Standard ACDP, whichever is applicable.
- 2.6 **Emergency Stationary RICE** The permittee must comply with the following requirements for emergency stationary reciprocating internal combustion engines (RICE). For each emergency stationary RICE, the permittee must:
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;
  - d. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes;
  - e. The permittee must install a non-resettable hour meter on each emergency stationary RICE, if one is not already installed.
- 2.7 **Operating Conditions for Emergency Stationary RICE** The permittee must operate any emergency stationary RICE in compliance with the following conditions:
  - a. There is no time limit on the use of emergency stationary RICE in emergency situations.
  - b. Emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Required maintenance and testing of such units is limited to 50 hours per year.

- c. The permittee is prohibited from using the emergency stationary RICE for any non-emergency use including but not limited to peak shaving, demand response operation, and/or generation of income from the sale of power.
- d. The permittee must keep records of the hours of operation of each emergency stationary RICE that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation used for maintenance checks and readiness testing.

### 3.0 SPECIFIC EMISSION STANDARDS AND LIMITS

#### 3.1 Applicability of Chromium Emission Limitations

The following emission limits apply during tank operation, start-up, and shutdown. The emission limitations do not apply during periods of malfunctions, but the work practice standards that address operation and maintenance (Condition 4.1) must be followed during malfunctions.

#### 3.2 Chromium Emission Limitations

For each hard chromium electroplating tank, the permittee must control chromium emissions discharged to the atmosphere by either:

- a. Not allowing the concentration of total chromium in the exhaust gas stream discharged to atmosphere to exceed the following emission limits. Special compliance provisions apply for multiple sources controlled by a common add-on air pollution control device.

Affected Tanks	Emission Limit
Small, existing tanks <sup>a</sup>	0.015 mg of total chromium/dscm
Large, existing tanks	0.011 mg of total chromium/dscm
New tanks <sup>b</sup>	0.006 mg of total chromium/dscm

<sup>a</sup>*Small* means a facility that performs hard chromium electroplating and has a maximum or actual cumulative rectifier capacity less than 60 million amp-hour/year. Initial demonstration that a facility was *small* had to be completed by January 25, 1997. (See Condition 6.7 for information on recordkeeping for this requirement.)

<sup>b</sup>*New* means a tank, the construction or reconstruction of which commenced after February 8, 2012.

- b. If a chemical fume suppressant containing a wetting agent is used, not allowing the surface tension of the



electroplating or anodizing bath contained within the affected tank to exceed 40 dynes per centimeter (cm) as measured by a stalagmometer or 33 dynes/cm as measured by a tensiometer, at any time during tank operation.

- c. In lieu of complying with either Condition 3.2a or 3.2b, for enclosed tanks that are large, existing tanks, not allowing the mass rate of total chromium in the exhaust gas stream discharged to the atmosphere to exceed the maximum allowable mass emission rate determined by using the calculation procedure in Condition 3.3a.
- d. In lieu of complying with either Condition 3.2a or 3.2b, for enclosed tanks that are small, existing tanks, not allowing the mass rate of total chromium in the exhaust gas stream discharged to the atmosphere to exceed the maximum allowable mass emission rate determined by using the calculation procedure in Condition 3.3a.
- e. In lieu of complying with either Condition 3.2a or 3.2b, for enclosed tanks that are new, not allowing the mass rate of total chromium in the exhaust gas stream discharged to the atmosphere to exceed the maximum allowable mass emission rate determined by using the calculation procedure in Condition 3.3b.
- f. After September 21, 2015, the permittee must not add PFOS-based fume suppressants to any affected open surface hard chromium electroplating tank.
- g. If multiple hard chromium electroplating tanks are controlled by a common add-on air pollution control device, the emission limit must be met at the outlet of the add-on air pollution control device. If the add-on air pollution control device also controls emissions from non-hard chromium electroplating tanks, the emission limit must be calculated according to 40 CFR Part 63.344(e)(3).

**3.3 Maximum Allowable Mass Emission Rate**

The following procedures must be used to calculate the maximum allowable emission rate if the permittee chooses to meet the mass emission rate standard in Condition 3.2c or 3.2d. Compliance with the alternative mass emission limit is demonstrated if the three-run average mass emission rate determined from EPA Method 306 or 306A testing is less than or equal to the maximum allowable mass emission rate calculated as follows:

- a. For an enclosed tank that is a large, existing tank, and if choosing to comply with Condition 3.2c, the permittee must determine compliance by not allowing the mass rate of total chromium in the exhaust gas stream discharged to

the atmosphere to exceed the maximum allowable mass emission rate calculated using the following equation:

$$\text{MAMER} = \text{ETSA} \times K \times 0.011 \text{ mg/dscm}$$

Where:

MAMER = the alternative emission rate in mg/hr.

ETSA = the surface area of the tank in square feet (ft<sup>2</sup>).

K = a conversion factor, 425 dscm/(ft<sup>2</sup> x hr).

- b. For an enclosed tank that is a small, existing tank, and if choosing to comply with Condition 3.2d, the permittee must determine compliance by not allowing the mass rate of total chromium in the exhaust gas stream discharged to the atmosphere to exceed the maximum allowable mass emission rate calculated using the following equation:

$$\text{MAMER} = \text{ETSA} \times K \times 0.015 \text{ mg/dscm}$$

Where:

MAMER = the alternative emission rate in mg/hr.

ETSA = the surface area of the tank in square feet (ft<sup>2</sup>).

K = a conversion factor, 425 dscm/(ft<sup>2</sup> x hr).

- c. For an enclosed tank that is a new tank, and if choosing to comply with Condition 3.2e, the permittee must determine compliance by not allowing the mass rate of total chromium in the exhaust gas stream discharged to the atmosphere to exceed the maximum allowable mass emission rate calculated using the following equation:

$$\text{MAMER} = \text{ETSA} \times K \times 0.006 \text{ mg/dscm}$$

Where:

MAMER = the alternative emission rate in mg/hr.

ETSA = the surface area of the tank in square feet (ft<sup>2</sup>).

K = a conversion factor, 425 dscm/(ft<sup>2</sup> x hr).

## **4.0 OPERATION AND MAINTENANCE REQUIREMENTS**

### **4.1 Work practices**

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 safety and good air pollution control practices for minimizing emissions and consistent with the operation and maintenance plan required in Condition 4.2. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.

The facility must have an operation and maintenance plan.

**4.2 O&M Plan Requirement**

- a. The permittee must keep the written operation and maintenance plan onsite to be made available for inspection, for the life of the affected source or until the source is no longer subject to this permit. In addition, if the operation and maintenance plan is revised, the permittee must keep previous versions of the operation and maintenance plan onsite for a period of 5 years after each revision to the plan.
- b. To satisfy the requirement to have an operation and maintenance plan, the permittee may use any applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided they meet the requirements below.

**4.3 O&M Plan Content**

The O&M plan must include:

- a. The operation and maintenance criteria for the affected source(s), the add-on air pollution control device, and the process and control system monitoring equipment.
- b. A standardized checklist to document the operation and maintenance of the affected source(s), the add-on pollution control devices, and the process and control system monitoring equipment.
- c. If using an add-on air pollution control device or monitoring equipment, work practice standards for that device or monitoring equipment. Add-on pollution control devices and their work practices are identified in Condition 4.7, Table 1. Other alternatives may be used after being approved by EPA. See 40 CFR 63.343(c)(8).
- d. If not using the specific equipment listed in Table 1 of Condition 4.7, proposed work practice standards to be submitted as required under 40 CFR 63.343(d).
- e. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
- f. A systematic procedure to identify malfunctions of the affected source(s), add-on air pollution control devices, and process and control system monitoring equipment and to implement corrective actions to address such malfunctions.
- g. Housekeeping procedures, as specified in Condition 4.8, Table 2.

**4.4 O&M Plan Revisions**

If the plan fails to address or inadequately addresses a malfunction, the plan must be revised within 45 days after the

malfunction occurs. The revised plan must include procedures for operating and maintaining the affected source(s), add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. Within 2 days after commencing corrective actions inconsistent with the plan, the permittee must record the actions taken and report such actions to LRAPA by phone. The report must be followed by a letter sent to LRAPA within 7 working days of the event, unless the permittee makes alternative reporting arrangements with LRAPA.

- 4.5 Fugitive Emission Control Plan** The permittee must submit a fugitive emission control plan within 60 days of request by LRAPA. The plan must be implemented whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period. The plan must be kept on site and be made available upon request.
- 4.6 Inspection of Equipment** The permittee must inspect control devices, ductwork, and monitoring equipment according to Condition 4.7, Table 1. The results of the inspection must be logged, and the log kept on site for a period of at least 5 years.

**4.7 Table 1 - Summary of Work Practice Standards**

Control Techniques	Work Practice Standards	Frequency
Composite mesh-pad (CMP) system	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.	Once per quarter
	Visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.	
	Visually inspect ductwork from the tank to the control device to ensure there are no leaks.	
	Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.	Per manufacturer
Packed-bed scrubber (PBS)	Visually inspect device to ensure there is proper drainage, no chromic acid buildup on the packed beds, and no evidence of chemical attack on the structural integrity of the device.	Once per quarter
	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.	
	Visually inspect ductwork from the tank to the control device to ensure there are no leaks.	
	Add fresh water to top of the packed bed. <sup>a,b</sup>	As makeup is added
PBS/CMP system	Same as Composite mesh-pad system	
Fiber-bed mist eliminator	Visually inspect fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices.	Once per quarter

Control Techniques	Work Practice Standards	Frequency
Air pollution control device (APCD) not listed in rule	Visually inspect ductwork from the tank to control device to ensure that there are no leaks.	
	Perform washdown of fiber elements in accordance with manufacturer's recommendations.	Per manufacturer
	Performed as approved by LRAPA.	Once per quarter, or more frequently per manufacturer
<b>Monitoring Equipment:</b>		
Pitot tube	Backflush with water, or remove from the duct and rinse with fresh water. Check pitot tube ends for damage. Replace pitot tube if cracked or fatigued. Replace in duct and rotate 180 degrees to ensure that the same zero reading is obtained.	
Stalagmometer/Tensiometer	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 packing 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.

#### 4.8 Table 2 – Housekeeping Practices

For	The permittee must	Minimum Frequency
1. Any substance used in an affected chromium electroplating tank that contains hexavalent chromium	Store the substance in a closed container in an enclosed storage area or building; AND	At all times, except when transferring the substance to and from the container.
	Use a closed container when transporting the substance from the enclosed storage area.	Whenever transporting 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 in accordance with Item 4 of these housekeeping measures.	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	Prior to operating the tank.
	Contain and return to the tank any bath solution that drains or drips from parts as the parts are removed from the tank; OR	Whenever removing parts from an affected tank.
	Collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed from the tank.	Whenever removing parts from an affected tank.

For	The permittee must	Minimum Frequency
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 to ensure that any hexavalent chromium laden liquid captured by the splash guard is returned to the affected chromium 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 chromium.	Clean up, 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.
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.	Clean the surfaces using one or more of the following methods: HEPA vacuuming; Hand-wiping with a damp cloth; Wet mopping; Hose down or rinse with potable water that is collected in a wastewater collection system; Other cleaning method approved by the permitting authority; OR	At least once every 7 days if one or more chromium electroplating or chromium anodizing tanks were used, or at least after every 40 hours of operating time of one or more affected chromium electroplating or chromium anodizing tank, whichever is later.
	Apply a non-toxic chemical dust suppressant to the surfaces.	According to manufacturer's recommendations.
6. All buffing, grinding, or polishing operations that are located in the same room as chromium electroplating or chromium 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 times.

## 5.0 COMPLIANCE DEMONSTRATION

### 5.1 Initial Performance Test

To demonstrate compliance with the emission limitations for affected tanks not using wetting agents in Conditions 3.2a, 3.2c, 3.2d, or 3.2e, a performance test(s) is required and must be performed according to 40 CFR 63.7 and 63.344(a) through (c).

- New sources are required to conduct the initial performance test within 180 days after initial startup.
- Existing sources that have yet to demonstrate compliance with the emission limits in Conditions 3.2a, 3.2c, 3.2d, or

3.2e are required to conduct the initial performance test as soon as possible but not later than 180 days after assignment to this permit.

- c. During the performance test, the permittee must establish site specific operating parameter(s) according to the procedures in 40 CFR 63.343(c) and 63.344(d).
- d. All tests must be conducted in accordance with DEQ's Source Sampling Manual and with the pretest plan submitted at least 15 days in advance and approved by the LRAPA Source Test Coordinator.
- e. The permittee must operate the equipment at normal maximum capacity.
- f. Only regular operating staff may adjust production processes and emission control parameters during the source test and within two (2) hours prior to the tests. Any operating adjustments made during the source test, which are a result of consultation during the tests with source testing personnel, equipment vendors or consultants, may render the source test invalid.
- g. The permittee must submit the test data and results for review to the LRAPA Source Test Coordinator within sixty (60) days of the test unless otherwise approved in the pretest plan. The results must be submitted in units of grains per dry standard cubic foot, milligrams per dry standard cubic meter, and in units of pounds per ampere hour.

**5.2 Ongoing Source  
Test requirement**

- a. Existing permittees that have completed the initial performance test required by Condition 5.1 prior to or on September 19, 2012, and one subsequent performance test prior to October 1, 2018, must demonstrate ongoing compliance with the emission limitations for affected tanks not using wetting agents in Conditions 3.2a, 3.2c, 3.2d, or 3.2e by conducting an additional performance test at least once during the permit term. The performance test(s) must be performed according to 40 CFR 63.7 and 63.344(a) and (c), and Conditions 5.1.b through f.
- b. New permittees that are or have been assigned to this permit (AQGP-001) after September 19, 2012 must complete or have completed the initial performance test according to Condition 5.1 and an additional compliance test at least once during the permit term to demonstrate ongoing compliance with the emission limitations for affected tanks not using wetting agents in Conditions 3.2a, 3.2c, 3.2d, or 3.2e. The performance test(s) must be performed according to 40 CFR 63.7 and 63.344(a) and (c), and Conditions 5.1b through f.

**5.3 Monitoring  
Requirements**

The permittee must monitor the operation and maintenance of the plant and associated air contaminant control devices as follows:

- a. On and after the date on which the initial performance test is required to be completed, the permittee must conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation.
- b. To be in compliance with the standards, the permittee must operate the control system within the parameters shown in the following table:

Emission Reduction Technique	Monitoring Parameter	Monitoring Frequency
Composite mesh-pad system (CMP) or Combination CMP/PBS system	The pressure drop across the unit (or CMS/PBS system) must be maintained within the range of compliant values established during multiple performance tests or within $\pm 2$ inches of water column of the pressure drop value established during the performance test. This requirement does not apply during automatic wash down cycles.	Once per day



Packed bed scrubber (PBS)	The velocity pressure at the inlet to the unit must be maintained within the range of compliant values established during multiple performance tests or within $\pm 10$ percent of the velocity pressure value established during the initial performance test, and the pressure drop across the unit must be maintained within the range of compliant values established during multiple performance tests or within $\pm 1$ inch of water column of the pressure drop value established during the performance test.	
Fiber-bed mist eliminator	The pressure drop across the eliminator and the upstream control device must be maintained within the range of compliant values established during multiple performance tests or within $\pm 1$ inch of the water column of the pressure drop value established during the performance test.	
Wetting agent or combination wetting agent and foam blanket	Bath surface tension must be below 40 dynes/cm as measured by a stalagmometer or 33 dynes/cm as measured by a tensiometer or the maximum value established during the performance test.	Every 4 hours of tank operation
Foam blanket	Foam blanket thickness must be at least 1 inch or the thickness established during the performance test.	Every 1 hour of tank operation

- c. When a combination of emission reduction techniques are used, the permittee must monitor each separately.
- d. The frequency of monitoring for wetting agents can be reduced according to the following table, in accordance with 40 CFR 63.343(c)(6):

Operational Hours	Monitoring Frequency	If no exceedance in previous period	If exceedance(s) in previous period
Hour 1-40	Every 4 hours		
Hour 41-80		Every 8 hours	Every 4 hours
Hour 81-120		Every 40 hours	
Tank drained; new solution added	Every 4 hours		

## **6.0 RECORDKEEPING REQUIREMENTS**

- |   |  |
|---|--|
| <b>6.1 Inspection and Maintenance Records</b> | The permittee must keep inspection and maintenance records for each tank(s), add-on pollution control device, and monitoring equipment, except routine housekeeping practices, to document that the inspection and maintenance requirements in Condition 4.1 and Condition 4.6 have taken place. The inspection records can take the form of a checklist and should identify the following: <ul style="list-style-type: none"><li>a. Device inspected;</li><li>b. Date of inspection;</li><li>c. A brief description of the working condition of the device during the inspection; and</li><li>d. Any actions taken to correct deficiencies found during the inspection.</li></ul> |
| <b>6.2 Malfunction Records</b>                | The permittee must keep records of the occurrence, duration, and cause (if known) of each malfunction of each affected source, associated pollution controls, and monitoring equipment. Records of actions taken during the malfunction to minimize emissions in accordance with Condition 3.1, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.  |
| <b>6.3 Operation and Maintenance Plan</b>     | The permittee must keep records, which may take the form of checklists, necessary to demonstrate compliance with the provisions of the operation and maintenance plan required in Condition 4.2.   |
| <b>6.4 Test Reports and Measurements</b>      | The permittee must keep test reports documenting results of all performance tests and records of all measurements necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures for single control of multiple sources in accordance with 40 CFR 63.344(e).  |
| <b>6.5 Monitoring Data</b>                    | The permittee must keep records of monitoring data required in Condition 5.3 that are used to demonstrate compliance with the standard in Condition 3.2 including the date and time the data are collected.  |
| <b>6.6 Operating Time</b>                     | The permittee must keep records of the total operating time of each affected source during the reporting period (hours).   |
| <b>6.7 Ampere Hours</b>                       | If the actual cumulative rectifier capacity was used to demonstrate that the facility is a small hard chromium electroplater, according to 40 CFR 63.342(c)(3), the permittee must keep records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at the facility expended during each month of  |

the reporting period, and the total capacity expended to date for the reporting period.

- 6.8 Fume Suppressant** If fume suppressants are used to comply with the standards in Condition 3.2, the permittee must keep records of the date and time that fume suppressants are added to the electroplating bath and records of the fume suppressant manufacturer and product name.
- 6.9 Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on 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 as a three-minute aggregate period as specified in Condition 2.1. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after beginning of the excess emissions, unless continued operation is approved by LRAPA in accordance with LRAPA Title 36.
- 6.10 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.
- 6.11 Retention of Records** The permittee must maintain files of all information (including all reports and notifications) required by this permit recorded 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.

## **7.0 REPORTING REQUIREMENTS**

- 7.1 Reporting Forms** Reporting forms for all required notifications and reports are available from LRAPA.
- 7.2 Initial Notification of Affected Facility** For each new source, notification must be submitted with the notification of construction required in Condition 7.3.

- 7.3 Notification of Construction** Prior to constructing a new affected source, reconstructing an affected source, or reconstructing a source such that it becomes an affected source, the permittee must:
- Submit a notification of construction/re-construction 60 days prior to the date construction begins.
  - Submit a notification of the actual date of startup of the source within 30 days after such date.
- 7.4 Notification of Compliance Status** For each new source, the permittee must submit a notification of compliance status within 90 days after completion of the performance test, or within 30 days after initial startup if a performance test is not required. Included with this notification must be a report of the results of any performance test, if required.
- 7.5 Annual Ongoing Compliance Status Report** The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year unless otherwise approved by LRAPA:
- Company name and address of the affected source;
  - Beginning and ending dates of the reporting period;
  - Identification of the operating parameter that is monitored for compliance determination required by Condition 5.3 and the operating parameter value, or range of values, that correspond to compliance with the emission limitation in Condition 3.2:
    - For surface tension - sampling device, sampling schedule and sampling results in dynes per centimeter; or,
    - For control devices – summary of work practice standards in Condition 4.7 Table 1 and monitoring results in Condition 6.5.
  - Total operating time of each affected source during the reporting period (hours).
  - Actual cumulative rectifier capacity of hard chromium electroplating tanks expended during each month of the reporting period, and the total capacity expended to date for the reporting period if the actual cumulative rectifier capacity was used to demonstrate that the facility is a small hard chromium electroplater.
  - Date and time that fume suppressants are added to the electroplating bath if fume suppressants are used to comply with the standard in Condition 3.2.
  - Summary of complaints relating to air quality received by permittee during the year.

- h. List of permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
- i. List of major maintenance performed on pollution control equipment.
- j. Current plant site contact. Provide name, title, phone number and email address.
- k. All reports and certifications submitted to LRAPA must accurately reflect the monitoring, recordkeeping and other documentation held or performed by the owner or operator.

**7.6 Exceedance Report**

*Excess emissions* are emission levels that exceed the limits identified in Condition 3.2 as indicated by the monitoring data collected in accordance with Condition 5.3. If either of the following conditions is met, semiannual reports must be prepared and submitted to LRAPA.

- a. The total duration of excess emissions (as indicated by the monitoring data collected by the permittee in accordance with Condition 5.2) is 1% or greater of the total operating time for the reporting period; and
- b. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5% or greater of the total operating time for the reporting period.

Once the permittee reports an exceedance as defined above, ongoing compliance status reports must be submitted semiannually until a request to reduce reporting frequency, as allowed by 40 CFR 63.347(h)(3), is approved. LRAPA may determine on a case-by-case basis that the exceedance report must be completed more frequently and submitted.

**7.7 Notification of Performance Test**

The permittee must notify LRAPA at least 60 calendar days before a performance test is scheduled to begin. If the permittee is unable to conduct the performance test as scheduled, LRAPA must be notified at least 5 days prior to the scheduled date. Notification must include the rescheduled date of the test.

**7.8 Performance Test Report**

Within 60 days after the date of completing each performance test, the permittee must submit the results of the performance tests, including any associated fuel analyses, to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)) in accordance with 40 CFR 63.347(f)(3)(i).

- 7.9 Relocation Notice** The permittee must not install or operate the facility or any portion of the facility at any new site without first providing written notice to the LRAPA Permit Coordinator. The written notice must include the date of the proposed move, approximate dates of operation, a detailed map showing access to the new site, and a description of the air pollution controls and procedures to be installed, operated, and practiced at the new site. Additional permits may be required if the permittee operates individual components of the facility at more than one site.
- 7.10 Notification 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.
- 7.11 Construction or Modification Notices** The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or other permit application form and obtain approval in accordance with LRAPA 34-034 through 34-038 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
  - b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
  - c. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
  - d. Constructing or modifying any air pollution control equipment.
- 7.12 Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 8.2.

## **8.0 ADMINISTRATIVE REQUIREMENTS**

- 8.1 Reassignment to the General ACDP** A complete application for reassignment to this permit is due within 30 days prior to the expiration date of the General ACDP or within 30 days after the permit is reissued. LRAPA will notify the permittee when the permit is reissued. The application must be sent to the LRAPA office.
- 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.

- 8.2 Permit Coordinator Address** All reports, notices, and applications should be directed to the LRAPA Permit Coordinator. The Permit Coordinator address is as follows:  
Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
Telephone: 541-736-1056
- 8.3 LRAPA Website** Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page: [www.lrapa.org](http://www.lrapa.org)  
All inquiries about this permit should be directed to the LRAPA office.

## **9.0 FEES**

- 9.1 Annual Compliance Fee** The Annual Compliance Determination Fee specified in LRAPA Title 37, Section 37-0090, Table 2, Part 2(c) for a Class Three 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 the above date.
- 9.2 Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in LRAPA Title 37, Section 37-0090, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company of a source assigned to this permit.
- 9.3 Where to Submit Fees** Fees must be submitted to:  
Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
(541) 736-1056

## **10.0 GENERAL CONDITIONS AND DISCLAIMERS**

- 10.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3 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.
- 10.4 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.
- 10.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.7 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.
- 10.8 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.
- 10.9 Modification or Revocation** LRAPA may modify or revoke this permit pursuant to LRAPA 37-0060(3), (4) and, 37-0082(4).



## 11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NA	not applicable
APCD	air pollution control device	NAICS	North American Industrial Classification System
ASTM	American Society for Testing and Materials	NESHAP	National Emissions Standards for Hazardous Air Pollutants
calendar year	The 12-month period beginning January 1st and ending December 31st	NO <sub>x</sub>	nitrogen oxides
CFR	Code of Federal Regulations	NSPS	New Source Performance Standard
CO	carbon monoxide	NSR	New Source Review
cm	centimeter	O <sub>2</sub>	oxygen
CMP	composite mesh-pad	OAR	Oregon Administrative Rules
DEQ	Oregon Department of Environmental Quality	ORS	Oregon Revised Statutes
Dscf	dry standard cubic foot	O&M	operation and maintenance
Dscm	dry standard cubic meter	Pb	Lead
EPA	US Environmental Protection Agency	PFOS	Perfluorooctane sulfonic acid
ETSA	Electroplating Tank Surface Area	PBS	packed bed scrubber
gal	gallon(s)	PCD	pollution control device
gr/dscf	grains per dry standard cubic foot	PM	particulate matter
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	PM <sub>10</sub>	particulate matter less than 10 microns in size
ID	identification number	ppm	part per million
I&M	inspection and maintenance	ppmv	part per million by volume
K	conversion constant	PSD	Prevention of Significant Deterioration
Lb	pound(s)	PSEL	Plant Site Emission Limit
LRAPA	Lane Regional Air Protection Agency	PTE	Potential to Emit
MAMER	Maximum Allowable Mass Emission Rate	RICE	Reciprocating Internal Combustion Engine
Mg	milligram	scf	standard cubic foot
Mg/dscm	milligrams per dry standard cubic meter	SIC	Standard Industrial Code
MMBtu	million British thermal units	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

AQGP-001, hard chrome platers  
 Max 4/3/07, KE 3/22/17, Max 3/24/17, Max 6/18/18

Lane Regional Air Protection Agency



**GENERAL**  
**AIR CONTAMINANT DISCHARGE PERMIT**  
**ASSESSMENT REPORT**

**HARD CHROMIUM ELECTROPLATING**

*Advanced Diamond Products  
Dba Northwest Superabrasives  
Source No. 205815  
1360 West 1<sup>st</sup> Avenue  
Eugene, Oregon 97402*

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from hard chromium electroplating tanks.
2. If there are other emissions activities occurring at the facility besides those regulated by this permit, the facility may be required to obtain a Simple or Standard ACDP or General ACDP Attachment(s), if applicable. This facility is also operating under General ACDP Attachment AQGP-026a for plating and polishing operations subject to the 6W NESHP.
3. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.

ASSESSMENT OF EMISSIONS

4. Facilities assigned to this General Permit are sources of hexavalent chromium emissions.
5. 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 LRAPA Title 12.

FACILITY EMISSION UNITS

6. The facility has the following equipment and/or activities regulated by the permit:

Emission Unit (EU)	Description
Hard Chromium Plating Tank – 1 (Large)	Hard chrome plating tank controlled by a composite mesh-pad (CMP) mist eliminator system.

## SOURCE TEST RESULTS

7. The facility has the following test results:

Test Date	EU/Tank	Result	Limit
September 27, 2018	Tank #1	0.001 (not yet QA'd)	0.011 mg/dscm
December 13-14, 2005	Tank #1	0.0075 mg/dscm	0.015 mg/dscm

## SPECIFIC AIR PROGRAM APPLICABILITY

8. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 CFR Part 63, Subpart N (Hard and Decorative Chromium Electroplating and Chromium Anodizing) for hard chromium electroplating. EPA promulgated the NESHAP on January 25, 1995, and several amendments and/or corrections since initial promulgation. EPA finalized a residual risk and technology review on September 19, 2012. That review resulted in revisions to the emission limits for total chromium, addition of housekeeping requirements to minimize fugitive emissions, and a requirement to phase-out the use of perfluorooctane sulfonic acid based fume suppressants. The NESHAP, including amendments and corrections through July 1, 2017, were adopted as a local rule in LRAPA Title 44.

## NESHAP APPLICABILITY

9. The NESHAP applies to each chromium electroplating or chromium anodizing tank at facilities performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing.
10. Process tanks associated with a chromium electroplating or chromium anodizing process, but in which neither chromium electroplating nor chromium anodizing is taking place, are not subject to the provisions of the NESHAP. Examples of such tanks include, but are not limited to, rinse tanks, etching tanks, and cleaning tanks. Likewise, tanks that contain a chromium solution, but in which no electrolytic process occurs, are not subject to this subpart. An example of such a tank is a chrome conversion coating tank where no electrical current is applied.

## NESHAP MACHINE DEFINITIONS AND CLASSIFICATION:

11. The NESHAP splits chromium electroplating into two categories:

- a. Decorative chromium electroplating: The process by which a thin layer of chromium (typically 0.003 to 2.5 microns) is electrodeposited on a base metal, plastic, or undercoating to provide a bright surface with wear and tarnish resistance. In this process, the part(s) serves as the cathode in the electrolytic cell and the solution serves as the electrolyte. Typical current density applied during this process ranges from 540 to 2,400 Amperes per square meter ( $A/m^2$ ) for total plating times ranging between 0.5 to 5 minutes. Decorative chromium electroplating can be performed using either a chromic acid (or hexavalent chromium) bath or a trivalent chromium bath.
  - b. Hard chromium electroplating: A process by which a thick layer of chromium (typically 1.3 to 760 microns) is electrodeposited on a base material to provide a surface with functional properties such as wear resistance, a low coefficient of friction, hardness, and corrosion resistance. In this process, the part serves as the cathode in the electrolytic cell and the solution serves as the electrolyte. Hard chromium electroplating process is performed at current densities typically ranging from 1,600 to 6,500  $A/m^2$  for total plating times ranging from 20 minutes to 36 hours depending upon the desired plate thickness.
12. The NESHAP classifies facilities that perform hard chromium electroplating as follows:
- a. Large, hard chromium electroplating facility: A facility that has a maximum cumulative potential rectifier capacity greater than or equal to 60 million ampere-hours per year.
  - b. Small, hard chromium electroplating facility: A facility that has a maximum cumulative potential rectifier capacity less than 60 million ampere-hours per year.
13. The NESHAP defines maximum cumulative potential rectifier capacity as the summation of the total installed rectifier capacity associated with the hard chromium electroplating tanks at a facility, expressed in amperes, multiplied by the maximum potential operating schedule of 8,400 hours per year and 0.7, which assumes that electrodes are energized 70% of the total operating time.
14. The emission standards in the NESHAP are more stringent for large, hard chromium electroplating facilities. The NESHAP allows a hard chromium electroplating facility to change its classification from large to small by demonstrating that actual rectifier utilization for the facility is less than 60 million ampere-hours per year. Initial demonstration must be made prior to January 25, 1997 and the actual rectifier utilization must be maintained below 60 million ampere-hours per year after January 25, 1997. If the actual rectifier utilization exceeds 60 million ampere-hours per year after January 25, 1997, the facility will be classified as large.

## EMISSIONS

15. Particulate Matter (PM):

a. Emission factors from EPA's AP-42:

Process	Total PM (lb/A-hr)	EF Rating
Hard Chromium Electroplating	3.568E-5	C
-- With moisture extractor	3.996E-6	E
-- With polypropylene (poly) balls	1.256E-5	E
-- With fume suppressant	4.853E-6	E
-- With fume suppressant and poly balls	8.992E-7	E
-- With packed-bed scrubber	6.280E-7	E
-- With packed-bed scrubber, fume suppressant, and poly balls	7.850E-8	E
-- With chevron-blade mist eliminator	2.569E-6	E
-- With mesh-pad mist eliminator	3.711E-7	E
-- With packed-bed scrubber and mesh-pad eliminator	9.563E-10	E
-- With composite mesh-pad mist eliminator	1.142E-7	E

b. Annual PTE in lbs/yr for PM is calculated as follows:

$$E_{PM} = \sum_{i=1}^n (EF_i \times RC_i \times 8760 \text{ hrs / yr})$$

Where:

$E_{PM}$  = PM emissions, in lbs/yr  
 $EF_i$  = Emission factor for electroplating tank i, from table above  
or from a performance test on electroplating tank i, in  
lbs/Amperes-hr  
 $RC_i$  = Rectifier capacity for electroplating tank i, in Amperes  
n = The total number of electroplating tanks

c. Actual PM emissions in lbs/yr is calculated as follows:

$$E_{PM} = \sum_{i=1}^n (EF_i \times RU_i)$$

Where:

$E_{PM}$  = PM emissions, in lbs/yr  
 $EF_i$  = Emission factor for electroplating tank i, from table above  
or from a performance test on electroplating tank i, in  
lbs/Amperes-hr  
 $RU_i$  = Actual rectifier usage for electroplating tank i over a 12-  
month period, in Amperes-hr

n = The total number of electroplating tanks

16. Hazardous Air Pollutants (HAPs):

a. Emission factors from EPA's AP-42:

Process	Chromium Compounds (lb/A-hr)	EF Rating
Hard Chromium Electroplating	1.713E-5	B
-- With moisture extractor	1.998E-6	D
-- With polypropylene (poly) balls	5.995E-6	D
-- With fume suppressant	2.284E-6	D
-- With fume suppressant and poly balls	4.282E-7	D
-- With packed-bed scrubber	2.997E-7	D
-- With packed-bed scrubber, fume suppressant, and poly balls	3.711E-8	D
-- With chevron-blade mist eliminator	1.256E-6	D
-- With mesh-pad mist eliminator	1.713E-7	D
-- With packed-bed scrubber and mesh-pad eliminator	4.567E-10	E
-- With composite mesh-pad mist eliminator	5.424E-8	D

b. Annual PTE in lbs/yr for chromium compounds is calculated as follows:

$$E_{cr} = \sum_{i=1}^n (EF_i \times RC_i \times 8760 \text{ hrs / yr})$$

Where

$E_{cr}$  = Chromium emissions, in lbs/yr  
 $EF_i$  = Emission factor for electroplating tank i, from table above or from a performance test on electroplating tank i, in lbs/Amperes-hr  
 $RC_i$  = Rectifier capacity for electroplating tank i, in Amperes  
 $n$  = Total number of electroplating tanks

c. Actual chromium emissions in lbs/yr is calculated as follows:

$$E_{cr} = \sum_{i=1}^n (EF_i \times RU_i)$$

Where:

$E_{cr}$  = Chromium emissions, in lbs/yr  
 $EF_i$  = Emission factor for electroplating tank i, from table above or from a performance test on electroplating tank i, in lbs/Amperes-hr

$RU_i$  = Actual rectifier usage for electroplating tank i over a 12-month period, in Amperes-hr

$n$  = Total number of electroplating tanks

NESHAP EMISSION STANDARDS:

17. Emission Limits:

- a. New hard chromium electroplating tanks: Limit the concentration of total chromium emitted to the atmosphere to 0.006 mg/dscm.
- b. Existing hard chromium electroplating tanks located at a large, hard chromium electroplating facility: Limit the concentration of total chromium emitted to the atmosphere to 0.011 mg/dscm.
- c. Existing hard chromium electroplating tanks located at a small, hard chromium electroplating facility: Limit the concentration of total chromium emitted to the atmosphere to 0.015 mg/dscm.
- d. If a chemical fume suppressant containing a wetting agent is used: Limit the surface tension of the electroplating or anodizing bath contained within the affected tank to exceed 40 dynes/cm as measured by a stalagmometer or 33 dynes/cm as measured by a tensiometer, at any time during tank operation.
- e. Enclosed tanks (in lieu of complying with the above emission limits): Limit the total chromium emissions to rate determined by using the calculation procedure in the permit.
- f. After September 21, 2015: Do not add PFOS-based fume suppressants to any affected open surface hard chromium electroplating tank.

18. Work Practices Standards:

- a. Follow specific work practices to ensure that control system and monitoring equipment are maintained and operated properly.
- b. Follow additional work practices that include quarterly inspections of control devices, ductwork, and monitoring equipment.
- c. Develop an operation and maintenance (O&M) plan.

19. Housekeeping Standards: Follow specific housekeeping standards to minimize fugitive emissions.

NESHAP COMPLIANCE DEMONSTRATION

20. Initial Compliance:

- a. Perform an initial performance test.
- b. Establish operating parameters to be monitored in order to ensure continuous compliance.

21. Continuous Compliance:

- a. Monitor operating parameters to demonstrate continuous compliance.
- b. Conduct an ongoing compliance source test by November 1, 2023 for existing tanks not using wet suppressants:
- c. Maintain the following records for 5 years:
  - i. Records of actual rectifier utilization (if required);
  - ii. Inspection records;
  - iii. Equipment maintenance records;
  - iv. Malfunction records;
  - v. Records to demonstrate compliance with operation and maintenance plan;
  - vi. Records of fume suppressant usage, manufacturer, and product name;
  - vii. Records of occurrence, duration, and cause of excess emissions;
  - viii. Performance test results; and,
  - ix. Monitoring data.

NESHAP REPORTING:

22. The NESHAP specifies the information required for each report. Report forms are also available through LRAPA.
- a. Initial Notification Report: This report is used to notify EPA and LRAPA that a source is subject to the NESHAP. It also provides some preliminary facility and tank information. The notification is due according to the following schedule:
    - i. New sources: Due as 60 days before construction is scheduled to commence.
  - b. Initial Notification of Compliance Status Report: This report is due within 90 days after completion of the performance test, or within 30 days after the initial startup if a performance test is not required, and is used to demonstrate to EPA and LRAPA that the tank is in compliance with the NESHAP. It includes information on the how compliance was achieved, how it was initially demonstrated and the necessary ongoing demonstration measurements. For new facilities using add-on controls the report is due 270 days after startup.
  - c. Performance test report: This report is required within 60 days of completing a performance test. EPA requires this report to be submitted via EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)).
  - d. Ongoing Compliance Status Report: This report is required to be prepared and submitted to LRAPA by February 15 of each year that the permit is in effect.



- e. Exceedance Report: This report should be prepared semiannually and submitted to LRAPA if:
  - i. The total duration of excess emissions exceeds 1% of the total operating time for the reporting period; and
  - ii. The total duration of malfunction of the add-on air pollution control device and monitoring equipment exceeds 5% of the total operating time.

#### COMPLIANCE ASSURANCE

- 23. Facilities assigned to the permit are required to maintain records of fuel use, upset conditions, and complaints received at the facility. These items are reported to LRAPA annually.
- 24. LRAPA staff perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

#### REVOCATION OF ASSIGNMENT

- 25. 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

- 26. General Air Contaminant Discharge Permits are part of the LRAPA State Implementation Plan. As part of the permitting process, the public will be provided at least 30 days to submit written comments. LRAPA will review any comments and may modify the permits in response to the comments.



**ASSIGNMENT TO**  
**GENERAL AIR CONTAMINANT DISCHARGE PERMIT**

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

Issued To:

**Northwest Industrial Chrome**  
1360 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

Information Relied Upon:

Application Number: 67321  
Dated: July 26, 2021

Plant Site Location:

1360 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

Land Use Compatibility Statement:

From: City of Eugene  
Dated: April 29, 2002

**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 37-0060(2), and based on the land use compatibility findings included in the permit record.

  
Steven A. Dietrich, Director

1-12-22  
Dated

General ACDP Issued in Accordance with LRAPA Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-026a	12/01/2031	Plating and polishing operations subject to 40 CFR part 63 subpart WWWW, as adopted under LRAPA titles 37 and 44.
Rule Citation	LRAPA 37-8010, Table 1, Part B, 82	
SIC	3471	
NAICS	332813	

**SUPPLEMENTAL INFORMATION:**

<b>Facility Contact:</b>		
Name:	Tim Jablonski, Owner	
Phone number:	(541) 359-7635	
Email address:	<a href="mailto:Tim@nwidnchrome.com">Tim@nwidnchrome.com</a>	
<b>Permit Summary:</b>		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart WWWW (6W) and Subpart N
<b>Reports Required:</b>		
Annual	Yes	February 15 each year
NSPS	No	N/A
NESHAP	Yes	February 15 each year
Other	N/A	N/A
<b>Public Notice:</b>	Category I	

MKH 1/11/22: rr



**LANE REGIONAL AIR PROTECTION AGENCY**  
**GENERAL AIR CONTAMINANT DISCHARGE PERMIT**  
**ATTACHMENT**

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

This permit attachment is being issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060.

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

  
Steven A. Dietrich, Director

12-1-21  
Dated

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Plating and polishing operations including electroplating (other than chromium electroplating), electroless or non-electrolytic plating, non-electrolytic metal coating processes (e.g. chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, manganese phosphate coating), thermal spraying, dry mechanical polishing of finished metals and formed products after plating or thermal spraying, electroforming, and electropolishing, subject to 40 C.F.R. part 63 subpart WWWW, as adopted under LRAPA title 44.

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## 1.0 PERMIT ASSIGNMENT

### 1.1. Qualifications

The permittee must meet all of the following Conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP) attachment:

- a. The permittee is performing plating and polishing activities listed on the cover page of this permit attachment, 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. The source does not qualify for a Basic ACDP and a Simple or Standard ACDP is not required for the source; and
- d. The source is not having ongoing, recurring or serious compliance problems.

### 1.2. Exclusions

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

- a. Process units that are subject to the requirements of 40 C.F.R. 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. Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment;
- e. Dry mechanical polishing conducted to restore the original finish to a surface; or
- 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, and that does not use any material that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Safety Data Sheet for the material.

### **1.3. Assignment**

LRAPA will assign qualifying permittees to this permit attachment 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 qualifications in Condition 1.1 above, conditions of LRAPA Section 37-0060, or the Conditions of this permit attachment.

### **1.4. Permitted Activities**

Until this permit attachment expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit attachment in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit attachment.

### **1.5. Relation to Local Land Use Laws**

This permit attachment 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. The permittee must 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. Visible Emissions**

The permittee must comply with the following visible emission limits:

- a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than 3 minutes in any one hour; [LRAPA 32-010(3)]
- b. Aggregate times consist of the total duration of all reading during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive; and [LRAPA 32-010(2)]
- c. The visible emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)]

### **2.2. Fugitive Emissions**

The permittee must comply with the following:

- a. The permittee must take reasonable precautions to prevent particulate matter, including fugitive dust, from becoming airborne from all site operations from which it may be generated; [LRAPA 48-015(1)]
- b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period; [LRAPA 48-015(2)(a)]
- c. Compliance with the fugitive emissions standard in Condition 2.2.b is determined by EPA Method 22 at the downwind property boundary; and [LRAPA 48-015(2)(b)]
- d. If requested by LRAPA, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period following the procedures of EPA Method 22. [LRAPA 48-015(3)]

### **2.3. 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. [LRAPA 32-050]

### **2.4. Nuisance and Odors**

The permittee must comply with the following nuisance and nuisance odor requirements, as applicable:

- a. The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]

### **2.5. 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. [40 CFR 63.6(e)]

## **3.0 NESHAP 6W APPLICABILITY**

### **3.1. 40 C.F.R. Part 63 Subpart WWWW – Emission Standards for Plating and Polishing Operations**

The permittee must comply with all applicable provisions of 40 C.F.R. §63.11504 – §63.11513 for all affected emissions to which this subpart applies by the applicable date in §63.11506. The permittee must also comply with all applicable provisions of 40 C.F.R. Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standard, please refer to 40 C.F.R. Part 63, Subpart WWWW.

NESHAP Subpart WWWW is adopted and incorporated by reference in LRAPA title 44.

### **3.2. NESHAP Compliance Dates**

For an existing affected source (began construction or reconstruction on or before March 14, 2008), the permittee must have achieved compliance with the applicable requirements by July 1, 2010.

For a new affected source (began construction or reconstruction after March 14, 2008), the permittee must be in compliance with applicable requirements upon startup.

## 4.0 NON-CYANIDE ELECTROLYTIC TANKS

The requirements within this section apply to all non-cyanide electroplating, electroforming, or electropolishing tanks (hereafter referred to as 'electrolytic' process tanks) that contain one or more plating and polishing metal hazardous air pollutants and that operates at a pH of less than 12. [40 CFR 63.11507(a)]

### 4.1. Compliance Options and Associated Requirements

The permittee must not use any wetting agent or fume suppressants that contain per- or polyfluoroalkyl substances. For permittees that are already using these substances upon assignment to this permit attachment, the permittee may continue to use any inventory that is already purchased until the inventory is depleted. [LRAPA 37-0069(1) and OAR 340-245-0110]

The permittee must comply with all of the applicable management practices in Condition 10.0 and either 4.1(a), (b), or (c) for each affected electrolytic process tanks:

- a. **Use a wetting agent/fume suppressant in the bath of the affected tank(s).**
  - i. Initial Makeup: The permittee must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process; [40 CFR 63.11507(a)(1)(i)]
  - ii. Additions: The permittee must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath. The permittee must retain sufficient documentation of each addition to demonstrate that wetting agent/fume suppressants added to the tank comply with the original make-up of the tank. [40 CFR 63.11507(a)(1)(ii)]
  - iii. Bath Chemicals with Suppressants: 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 condition. The permittee must retain manufacturer's instructions and any associated records necessary to demonstrate that the instructions have been followed. [40 CFR 63.11507(a)(1)(iii)]
  - iv. Records: The permittee must retain sufficient documentation to demonstrate that wetting agent/fume suppressants added to the tank bath are in the original make-up of the tank. The permittee must retain manufacturer information or other detailed product information (e.g., SDS) for each wetting agent/fume suppressant used in each affected tank. [40 CFR 63.11509(e) and LRAPA 34-016(1)]
- b. **Notification of Compliance Status**: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether wetting agent/fume suppressants are added to the bath according to the manufacturer's specifications and instructions. **Capture and exhaust emissions from the affected tank(s) to a control device. Control devices must be either a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.** [40 CFR 63.11507(a)(2) and 63.11508(d)(3)(iii)]
  - i. Ongoing: The permittee must operate and maintain all control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11508(d)(2)]
  - ii. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of the control device



- according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]
- iii. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. The permittee must maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11508(d)(4)]
  - iv. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the control device(s) were installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(d)(4)]
- c. **Cover the surface of the affected tank(s).** [40 CFR 63.11507(a)(3)]
- i. For Batch process tanks:
    - A. Cover Requirement: The permittee must install and 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. The permittee must record the times that the tank is operated and the times the tank is covered on a daily basis.
    - B. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the affected tank(s) are operated with the cover in place at least 95 percent of the electrolytic process time. [40 CFR 63.11508(d)(6)]
  - ii. For Continuous process tanks:
    - A. Cover Requirement: The permittee must cover at least 75 percent of the surface area of the tank whenever the electrolytic process tank is in operation. [40 CFR 63.11508(d)(7)(i)]
    - B. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the tank is operated with the surface cover in place whenever the continuous electrolytic process is in operation. [40 CFR 63.11508(d)(7)(ii)]

## 5.0 'FLASH' OR SHORT-TERM ELECTROPLATING TANKS

The requirements within this section apply to all 'flash' or short-term electroplating tanks (AKA 'flash' process tanks) that uses or emits one or more plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(b)]

### 5.1. Compliance Options and Associated Requirements

The permittee must comply with all of the applicable management practices in Condition 10.0 and either 5.1(a) or (b) for each affected flash process tanks:

- a. **Limit flash electroplating to no more than one (1) cumulative hour per day or three (3) cumulative minutes per hour of plating time.**
  - i. Operational Time: The permittee must record the times that the affected tank is operated each day.
  - ii. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each affected tank is limited to no more than one (1) cumulative hour per day, or three

(3) cumulative minutes per hour of plating time. [40 CFR 63.11507(b)(1) and 63.11508(d)(5)]

b. **Use a tank cover for at least 95 percent of the plating time.**

- i. Cover: The permittee must install a tank cover on each affected tank and ensure the cover is in place for at least 95 percent of the plating time. The permittee must record the times that the tank is operated and the times the tank is covered on a daily basis. [40 CFR 63.11507(b)(2)]
- ii. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each affected tank is operated with a cover in place for at least 95 percent of the operating time. [40 CFR 63.11508(d)(6)]

## **6.0 BOTH FLASH AND LONGER TERM TANK USE**

For any process tank used in both flash electroplating and electrolytic processing for longer duration(s), the permittee must operate according to the requirements applicable to the specific process at any given time: [40 CFR 63.11507(c)]

- While the process tank is being used for flash electroplating, the permittee must comply with all applicable requirements of Condition 5.0.
- When the process tank is used for electroplating that does not meet the definition of flash electroplating, the permittee must comply with all applicable requirements of Condition 4.0. [40 CFR 63.11511]

The permittee must also comply with the applicable management practices in Condition 10.0.

## **7.0 CYANIDE-CONTAINING PROCESS TANKS**

The requirements within this section apply to all electroplating tanks that use cyanide in the plating bath, operates at pH greater than 12, and contains one of more of the plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(d)]

### **7.1. Compliance Requirements**

For each affected process tank the permittee must comply with all of the applicable management practices in Condition 10.0 and the following:

- a. Measure and Record: The permittee must measure and record the pH of the bath upon startup of the bath. No additional pH measurements are required. [40 CFR 63.11507(d)(1) and 40 CFR 63.11509(e)]
- b. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the pH of the bath solution for each affected tank was measured upon startup according to Condition 7.1a. [40 CFR 63.11508(c)(7)(i)]

## **8.0 DRY MECHANICAL POLISHING**

The requirements within this section apply to all dry mechanical polishing machines that emit one or more of the plating and polishing metal hazardous air pollutants. [40 CFR 63.11507(e)]

### **8.1. Control System, Filter, and Compliance Requirements**

The permittee must operate a control 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. [40 CFR 63.11507(e)]

- a. Ongoing: The permittee must operate and maintain all control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11507(e)(1)]
- b. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of each control device according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]
- c. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. The permittee must maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11507(e)(2), 63.11508(d)(4)(iv) and (v), and 40 CFR 63.11509(e)]
- d. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether each control system was installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(c)(2)(ii)]

## **9.0 THERMAL SPRAYING OPERATIONS**

The requirements within this section apply to each thermal spraying operation that applies one or more of the plating and polishing metal hazardous air pollutants. The permittee must comply with all of the applicable management practices in Condition 10.0. [40 CFR 63.11507(f)]

### **9.1. Permanent Thermal Spraying Operations**

The permittee must operate a capture system that collects PM emissions from each permanent thermal spraying process and transports the emissions to a fabric, cartridge, or HEPA filter; a permanent thermal spraying operation constructed on or before March 14, 2008 may transport the emissions to a water curtain. [40 CFR 63.11507(f)(1) and (2)]

- a. Control System O&M: The permittee must operate and maintain all capture and control devices according to the manufacturer's specifications and operating instructions. [40 CFR 63.11508(d)(4)(i)]
- b. Control System Instructions: The permittee must maintain manufacturer's specifications and operating instructions at the facility and at all times be kept in a location readily accessible by the operators. [40 CFR 63.11508(d)(4)(v)]
- c. Control System Malfunction/Failure: The permittee must take immediate corrective actions following a malfunction or failure of each control device according to manufacturer specifications and operating instructions. [40 CFR 63.11508(d)(4)(ii)]
- d. Control System Records: The permittee must maintain records of all control system inspections, deviations from proper operations, and corrective actions taken. [40 CFR 63.11508(d)(4)(iiv)]
- e. Notification of Compliance Status: In addition to the notification of compliance status

requirements of Condition 12.2, the permittee must state whether each control system was installed and operated according to the manufacturer's specifications and instructions. [40 CFR 63.11508(c)(2)(ii)]

## **9.2. Temporary Thermal Spraying Operations**

The permittee must document the amount of time the thermal spraying occurs each day, and where it is conducted. Thermal spraying operations complying with this Condition 9.2 instead of Condition 9.1 must not operate more than one (1) hour in any one day and must meet the definition of 'temporary thermal spraying' in Condition 16.0. [40 CFR 63.11507(f)(3) and 63.11511]

- a. Notification of Compliance Status: In addition to the notification of compliance status requirements of Condition 12.2, the permittee must state whether the management practices of Condition 10.0 have been implemented.

## **10.0 MANAGEMENT PRACTICES AND S.O.P.**

The requirements within this section apply to all emissions units and control devices identified within Conditions 4.0 through 9.0 that contain, apply, capture, control, or emits one or more plating and polishing metal HAP (hazardous air pollutants).

### **10.1. Management Practices**

The permittee must comply with all of the following management practices during all times that the affected tank or process is in operation, as applicable: [40 CFR 63.11507(g)]

- a. Minimize Bath Agitation. The permittee must minimize bath agitation when removing any parts processed in a tank except when necessary to meet part quality requirements.
- b. Maximize Draining. The permittee must 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.
- c. Optimize Design. The permittee must 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. The permittee must use tank covers, if already owned and available at the facility whenever possible. Permittees must also comply with the following, as applicable: [LRAPA 37-0069(1) and OAR 340-245-0110]
  - i. Permittees operating tanks that emit nickel must have tank covers installed and operated according to Condition 4.0 or 5.0, as applicable, no later than January 1, 2022 unless otherwise approved by LRAPA in writing.
  - ii. Permittees that install or begin operating a new or additional tank that emits nickel after January 1, 2022 must have tank covers installed upon startup of the nickel-containing tank.
- e. Minimize or Reduce Heating. The permittee must minimize or reduce heating of process tanks when doing so would not interrupt production or adversely affect part quality.
- f. Perform Routine Maintenance. The permittee must perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with tanks, thermal spraying, and dry mechanical polishing equipment.
- g. Minimize Contamination. The permittee must minimize bath contamination to the extent possible. Methods to be implemented may include but are not limited to: the prevention

or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, or thorough rinsing of pre-treated parts to be plated.

- h. Maintain Chemicals. The permittee must maintain quality control of chemicals and other bath ingredient concentrations in the tanks.
- i. Housekeeping. The permittee must perform general good housekeeping, such as regular sweeping, vacuuming, or periodic washdowns.
- j. Minimize Spills. The permittee must minimize spills and overflow of tanks.
- k. Use Squeegee Rolls. The permittee must use squeegee rolls in continuous or reel-to-reel plating tanks.
- l. Perform Inspections. The permittee must perform regular inspections to identify leaks and other opportunities for pollution prevention.

## 10.2. Standard Operating Procedures

The permittee must establish and maintain a written Standard Operating Procedures manual (or equivalent) that describes how the facility's specific processes and procedures comply with each management practice of Condition 10.1. An SOP compliant with this Condition must be developed and retained on site within six (6) months of assignment to this permit attachment or upon startup, whichever is later.

For management practices that are not applicable to any emissions units on site or otherwise not implemented, the SOP must explain why (*e.g.*, 'Facility X does not implement the squeegee roll management practice because there are no continuous or reel-to-reel plating tanks on site).

## 11.0 RECORDKEEPING REQUIREMENTS

### 11.1. General Compliance and Applicability Records

The permittee must keep the following records: [40 CFR 63.11509(e) and LRAPA 34-016]

- a. Notifications: A copy of all Initial Notification and Notifications of Compliance Status that are submitted and all documentation supporting those notifications.
- b. Startup and Shutdowns: 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. Malfunctions: The occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the associated air pollution control and monitoring equipment.
- d. Maintenance: All maintenance performed on the process equipment (tanks, dry mechanical polishing, and thermal spraying), air pollution control equipment, and monitoring equipment.
- e. Continuous Compliance: The records required to show continuous compliance with each management practice and equipment standard that applies.
- f. Manufacturer Documentation: The manufacturer documentation for any equipment or process that is required to comply according to manufacturer recommendations, instructions, or specifications.
- g. Ampere Hours: The total ampere hours for each tank that uses or has emissions of one or more of the plating and polishing metal HAPs (cadmium, chromium, lead, manganese, nickel).

- i. Permittees being reassigned to this permit attachment without the equipment necessary to monitor tank ampere hours may request that LRAPA provide additional time for the procurement and installation of this equipment.
- ii. Requests must be submitted in writing to LRAPA no later than 30 days after assignment to this permit attachment and include a description of the equipment that will need to be procured and an estimated date on which the permittee believes installation will be completed.
- iii. Requests must be submitted to the appropriate address in Condition 13.2. LRAPA may approve additional time but will require the installation and operation of equipment which provides for tank ampere hour recordkeeping no later than July 1, 2022.

#### **11.2. Excess Emissions**

Unless otherwise specified, the permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on 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.

#### **11.3. Retention of Records**

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of each report or record and make them available to LRAPA upon request. The permittee must maintain at least the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review during an on-site inspection. [40 CFR 63.11509(f) and LRAPA 34-016(5)]

#### **11.4. Complaint Log**

The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee must investigate the condition within 24 hours, if possible.

The log must include at least the following for each complaint or concern received: [LRAPA 34-016(1)]

- a. The date the complaint was received;
- b. The date and time the complaint states the condition was present;
- c. A description of the complaint;
- d. The location of the complainant or receptor relative to the plant site;
- e. The status of plant operations and activities during the complaint's stated time of pollution or odor condition;
- f. A description of the permittee's actions to investigate the validity of the complaint; and
- g. A description of any actions taken in response to the complaint investigation.

## 12.0 REPORTING REQUIREMENTS

### 12.1 NESHAP Initial Notification

The permittee must submit an initial notification if one has never been submitted, if the source is newly constructed and beginning operations, or upon request by LRAPA. An initial notification must comply the following: [40 CFR 63.11509(a)]

- a. Source Information Required: The notification must include the name and address of the owner or operator, the address (physical location) of the affected source, an identification of the relevant standard (NESHAP 6W), the permittee's compliance date, identification of the emission points at the permitted facility, types of hazardous air pollutants emitted, and a brief description of the nature, size, design, and method of operations;
- b. Compliance Methods: The notification must include a description of the compliance method(s) (e.g., use of wetting agent/fume suppressant) for each affected emissions unit;
- c. Due Date: The initial notification is due to LRAPA within 120 days of the source becoming subject to NESHAP 6W.
- d. Where to Send: Initial notifications must be submitted to the LRAPA office:  
Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

### 12.2. NESHAP Notification of Compliance Status

The permittee must submit a notification of compliance status if one has never been submitted, if the source is newly constructed and beginning operations, or upon request by LRAPA.

**If the permittee makes any changes that result in inaccurate information on the most recently submitted Notification of Compliance Status, the permittee must submit an amended notification of compliance status within 30 days of the change.** The report information for which changes would require an amended notification are identified below with '30-day change notification required'.

The Notification of Compliance Status report must comply with all of the following: [40 CFR 63.11509(b)]

- a. Information Required. The report must contain the following information:
  - i. List of affected emissions units (tanks, thermal spraying, and dry mechanical polishing) and whether cadmium, chromium, lead, manganese, or nickel are used in, or emitted by, those emissions units **[30-day change notification required]**;
  - ii. Identification or description of the methods used to comply with the applicable management practices and equipment standards;
  - iii. Description of the capture and emission control systems used to comply with the applicable equipment standards **[30-day change notification required]**;
  - iv. Additional information, as applicable, identified under 'Notification of Compliance Status' throughout this permit attachment for each emissions unit.  
(Note that each type of emissions unit covered by this permit attachment identifies

unique information that must be included with the Notification of Compliance Status); and

- v. A statement by the owner or operator of the facility as to whether all management practices required by Condition 10.0 have been implemented.
  - vi. A statement by the owner or operator of the facility as to whether the source is in compliance with the applicable standards and requirements. **[30-day change notification required]**
- b. Due Dates: A new affected source is required to submit a notification of compliance status before close of business on the date of initial startup. An existing source was required to submit a notification of compliance status no later than July 1, 2010.
  - c. Where to Send: The first Notification of Compliance Status must be submitted to the LRAPA office as listed below. Amended notifications of compliance status must be submitted to the LRAPA as listed below.

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

### 12.3. Annual Report

For each year this permit attachment is in effect, the permittee must submit to LRAPA by **February 15** one (1) copy of an annual report for the previous calendar year that includes at least the following: [LRAPA 34-016(1)&(2) and 40 CFR 63.11509(c)]

- a. A statement or certification of whether all applicable management practices have been implemented on site; [40 CFR 63.11508(d)(8)(i)]
- b. A statement certifying whether any deviations of the requirements of this permit attachment occurred during the reporting period. If any deviations occurred, the annual report must also include: [40 CFR 63.11509(d)]
  - i. Identification of the process tank or operation associated with the deviation;
  - ii. The date and time the deviation occurred;
  - iii. The permit Condition or description of the compliance requirement deviated from; and
  - iv. A description of the deviation and a description of the correction action(s) taken.
- c. A summary of complaints received relating to air quality concerns and the permittee's response or follow-up action(s); [LRAPA 34-016(5)]
- d. A description of any permanent changes made to processes or equipment that may affect air emissions;
- e. **For each electrolytic process tank using wetting agents or fume suppressants** to comply with Condition 4.1, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(3)]
  - i. The process or tank name or identification number;
  - ii. The type of electrolytic process;
  - iii. The name and type of wetting agent or fume suppressant used and the date(s) of each addition;
  - iv. A statement certifying that per- or polyfluoroalkyl substances are not used on site or a statement certifying how much of these products remain on site; and
  - v. Certification that the addition(s) were completed following the manufacturer's specifications and instructions.
- f. **For each electrolytic process tank, dry mechanical polishing operation, and thermal**



**spraying operation complying with the applicable requirements by using a control device, the permittee must include the following:** [LRAPA 34-016(5) and 40 CFR 63.11508(d)(4)]

- i. The process, operation, or tank name or identification number;
  - ii. The type of electrolytic process or other operation; and
  - iii. Certification that the control device(s) and system(s) were operated and maintained according to manufacturer's specifications and instructions.
- g. **For each flash process tank limiting the hours or minutes** to comply with Condition 5.1, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(5)]
  - i. The tank name or identification number;
  - ii. The process or tank type; and
  - iii. Certification that the tank was limited to one hour per day or 3 minutes per hour.
- h. **For each batch electrolytic process tank and each flash process tank using a cover** to comply with Condition 4.1.c or 5.1.b, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(6)]
  - i. The tank name or identification number;
  - ii. The process or tank type; and
  - iii. Certification that the tank was operated with the cover in place for at least 95% of the electrolytic processing time.
- i. **For each continuous electrolytic process tank using a cover** to comply with Condition 4.1.c, the permittee must include the following: [LRAPA 34-016(5) and 40 CFR 63.11508(d)(7)]
  - i. The tank name or identification number;
  - ii. The process or tank type; and
  - iii. Certification that the tank was operated with at least 75% of the tank surface area covered during all electrolytic processing time.
- j. Total ampere hours for each tank that uses or has emissions of one or more of the plating and polishing metal HAPs (cadmium, chromium, lead, manganese, nickel). [LRAPA 34-016(5)]

#### **12.4. 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 13.2.
- 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 submit follow-up reports when required by LRAPA.

#### **12.5. 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.

#### **12.6. Notice of Change of Ownership of Company Name**

The permittee must notify LRAPA in writing using a LRAPA "Transfer Application Form" within 60 days after any of 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.

#### **12.7. Construction of Modification Notices**

The permittee must notify LRAPA in writing using a LRAPA "Notice of Intent to Construct Form," or other permit application form, and obtain approval in accordance with LRAPA title 34 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

#### **12.8. Where to Send Reports and Notices**

The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 13.2.

### **13.0 ADMINISTRATIVE REQUIREMENTS**

#### **13.1. Reassignment to the General ACDP**

A permittee that wishes to continue assignment to this General ACDP must submit to LRAPA an application for reassignment as follows:

- a. The application must be received by LRAPA within 30 days prior to the expiration date listed on this permit attachment;
- b. The application must be sent to the LRAPA office identified in Condition 13.2.; and
- c. 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.

#### **13.2. Permit Coordinator Addresses**

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

#### **13.3. 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).

### **14.0 FEES**

#### **14.1. Annual Compliance Fee**

The annual fees specified in LRAPA 37-0020, Table 2, Part 2 and 3 are due on or by **December 1** of each year this permit attachment is in effect. Invoices indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

**14.2. Change of Ownership or Company Name Fee**

The Non-Technical Permit Modification specific activity fee specified in LRAPA 37-0020, Table 2, Part 4 is due with an application for changing the ownership or the name of the company of a source assigned to this permit attachment. Forms that require fees must be sent together to the address in Condition 14.3.

**14.3. Where to Submit Fees**

Fees, with a permit number prominently displayed, must be submitted to:

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, Oregon 97477

**15.0 GENERAL CONDITIONS AND DISCLAIMERS**

**15.1. Other Regulations**

In addition to the specific requirements listed in this permit attachment, the permittee must comply with all other applicable legal requirements enforceable by LRAPA.

**15.2. Conflicting Conditions**

In any instance in which there is an apparent conflict relative to conditions in this permit attachment, the most stringent conditions apply.

**15.3. 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.

**15.4. 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 attachment in accordance with ORS 468.095.

**15.5. Permit Availability**

The permittee must have a copy of the permit available at the facility at all times.

**15.6. Outdoor Burning**

The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.

**15.7. 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.

**15.8. Property Rights**

The issuance of this permit attachment 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.

**15.9. Termination, Revocation, Rescission, or Modification**

LRAPA may modify or revoke this permit attachment as authorized under LRAPA title 37.

## 16.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

6W	40 C.F.R. part 63 subpart WWWW as adopted in OAR chapter 340 division 244	Mn	Manganese
ACDP	Air Contaminant Discharge Permit	NA	not applicable
AQGP	Air Quality General Permit	NESHAP	National Emissions Standards for Hazardous Air Pollutants
AQMA	Air Quality Maintenance Area	Ni	Nickel
calendar year	The 12-month period beginning January 1st and ending December 31 <sup>st</sup>	OAR	Oregon Administrative Rules
CAO	Cleaner Air Oregon	OERS	Oregon Emergency Response System
Cd	Cadmium	ORS	Oregon Revised Statutes
C.F.R.	Code of Federal Regulations	O&M	operation and maintenance
Cr	Chromium	Pb	lead
DEQ	Oregon Department of Environmental Quality	PM	particulate matter
EPA	US Environmental Protection Agency	PM <sub>10</sub>	particulate matter less than 10 microns in size
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	PM <sub>2.5</sub>	particulate matter less than 2.5 microns in size
HEPA	high efficiency particulate air	PSEL	Plant Site Emission Limit
LRAPA	Lane Regional Air Protection Agency	SDS	Safety Data Sheet
Metal HAP	Cadmium, chromium, nickel, manganese, and lead	SIC	Standard Industrial Code
		SOP	Standard operating procedures
		VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

### Definition:

**Temporary Thermal Spraying** means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in Condition 1.1.b, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying. [40 CFR 63.11511]

Jce: 03/02/10

MKH 05/05/11: rcl 8/30/11

DRD 6/1/20. MKH 10/12/21:rr 12/1/21

AQGP-026a plating and polishing



Lane Regional Air Protection Agency

**GENERAL  
AIR CONTAMINANT DISCHARGE PERMIT  
ASSESSMENT REPORT**

**PLATING AND POLISHING**

*Northwest Industrial Chrome  
Source No. 205815  
1360 West 1<sup>st</sup> Avenue  
Eugene, Oregon 97402*

**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 National Emission Standard for Hazardous Air Pollutants (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 Hazardous Air Pollutant (HAP). Plating and polishing metal HAP means any compound of the following metals: cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and nickel (Ni). 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 activities that are included in the exemptions from the Plating and Polishing Operations NESHAP as follows:

- 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 Safety Data Sheet for the material
3. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities as defined under LRAPA Title 12. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
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 from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources of federal hazardous air pollutants and compliant with applicable emission limits.

#### FACILITY EMISSION UNITS

8. The facility has the following equipment and/or activities regulated by the permit:

Emission Unit (EU)	Description & Pollution Controls
Dry Mechanical Polishing	Dry mechanical polishing activity controlled by a baghouse
Wire-feed welder	Used approximately 5 minutes/week; no controls
Small Cabinet Blaster	Sand blasting controlled by baghouse. Collected material deposited in barrel; has been onsite for 3 years and collection barrel is currently only 1/3 full.

9. The facility also has the following equipment and/or activities regulated by the AQGP-001 for hard chrome plating:

Emission Unit (EU)	Description & Pollution Controls
Hard Chromium Plating Tank – 1 (Large)	Hard chrome plating tank controlled by a composite mesh-pad (CMP) mist eliminator system.

#### SOURCE TEST RESULTS

10. The facility has the following chromium test results for testing required under AQGP-001:

Test Date	EU/Tank	Result	Limit
September 27, 2018	Tank #1	0.001	0.011 mg/dscm
December 13-14, 2005	Tank #1	0.0075 mg/dscm	0.015 mg/dscm

#### SPECIFIC AIR PROGRAM APPLICABILITY

11. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA titles 32 and 48. The permit contains requirements and limitations to ensure compliance with these standards.
12. The General Permit incorporates the regulations in 40 CFR part 63 subpart HHHHHH for the Plating and Polishing Operations NESHAP. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on July 1, 2008. This NESHAP is adopted in LRAPA Title 44.
13. Oregon DEQ conducted a general activity-based risk screening for plating and polishing

sources. This permit requires that sources with nickel-emitting tanks install tank covers on a specified timeline, unless otherwise approved by LRAPA. Approval to not install tank covers will be limited to facilities that demonstrate that all nickel-containing tanks are controlled by a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator. Additionally, facilities must not use any wetting agent or fume suppressants that contain per- or polyfluoroalkyl substances. Permittees can use existing purchased inventory of these fume suppressants until they are exhausted.

#### COMPLIANCE ASSURANCE

14. Permittees are required to maintain records of notifications, startup and shutdowns, malfunctions, maintenance activities, production, compliance, work practice activities, and complaints received at the facility that relate to air pollution concerns. These items are reported to LRAPA annually, as applicable.
15. LRAPA staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

#### REVOCATION OF ASSIGNMENT

16. 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 more stringent level of permitting.

#### PUBLIC NOTICE

17. General Air Contaminant Discharge Permits are authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public was provided at least 30 days to submit written comments. There were no comments received during the public comment period.

#### DEFINITIONS

18. The terms not defined in the General Permit use the definitions found in LRAPA title 12, 40 CFR part 63 subpart A (General Provisions §63.2), or 40 CFR part 63 subpart WWWWWW (§63.11511).

**Batch electrolytic process tank** means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.



**Bench-scale** means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

**Composite mesh pad** means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

**Continuous electrolytic process tank** means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

**Cyanide plating** means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry.

**Deviation** means any instance in which an affected source fails to meet any Condition of the permit. This includes but is not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement. Deviation also includes failing to meet any Condition of this permit during startup, shutdown, or malfunction.

**Dry mechanical polishing** means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

**Electroless plating** means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

**Electrolytic plating processes** means electroplating and electroforming that use or emit any of the plating and polishing metal HAP where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

**Electroplating** means an electrolytic process that uses or emits any of the plating and polishing metal HAP in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

**Electropolishing** means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this permit, electropolishing does not include bench-scale operations.

**Flash electroplating** (or short-term electroplating) means an electrolytic process performed in a tank that uses or emits any of the plating and polishing metal HAP and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

**Mesh pad mist eliminator** means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

**Metal HAP content of material used in plating and polishing** means either 1) for plating, metal coating, or electropolishing this is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution; or 2) for thermal spraying this is the HAP content of the metal coating being applied. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates.

**Non-cyanide electrolytic plating and electropolishing processes** means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

**Non-electrolytic plating** means a process that uses or emits any of the plating and polishing metal HAP in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, electroless nickel plating, sodium dichromate sealing, and manganese phosphate coating.

**Plating and polishing facility** means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP: electroplating processes other than chromium electroplating (i.e., non-chromium electroplating); electroless plating; other

non-electrolytic metal coating processes performed in a tank, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

**Plating and polishing metal HAP** means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as reported on the Material Safety Data Sheet for the material, is considered to be a plating and polishing metal HAP.

**Repair** means any process used to return a finished object or tool back to its original function or shape.

**Short-term electroplating:** (see flash electroplating).

**Startup of the tank bath** is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

**Temporary thermal spraying** means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

**Thermal spraying (also referred to as metal spraying or flame spraying)** is a process that uses or emits any of the plating and polishing metal HAP in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.