

40 CFR 63 Subpart N

Chromium Electroplating and Anodizing Processes: Initial Performance Testing Under the NESHAP

September 2013

The Federal National Emission Standard for Hazardous Air Pollutants (NESHAP) affects all facilities that use chromium electroplating or anodizing tanks, regardless of size. What your facility must do to comply with the NESHAP depends on the size of your operation, what type of process you use (hard, decorative, or anodizing), and what control technique you employ.

This fact sheet provides a **general overview of the initial performance testing requirements that chromium electroplating and anodizing operations must perform.** State and local regulatory agencies may have additional requirements. If you require additional technical information, the Small Business Environmental Assistance Program (SBEAP) provides free and confidential assistance and can be contacted at the toll-free number listed below.

Initial Performance Testing

The NESHAP requires an initial performance test of your operations to determine if the chromium emissions from the source are less than, or equal to, the applicable emission limits for that source. The initial performance test also establishes values for pollution control systems operating parameters within facilities such as pressure drop or foam blanket thickness. Monitoring and recording these operating parameters during tank operation will tell you whether or not your facility is in compliance with the federal emission limits.

*Sources that meet **all of the following criteria are exempt from the initial performance testing requirements:***

- ✓ Decorative chromium electroplating tanks, hard chromium electroplating tanks, and chromium anodizing tanks that:
 - Use a wetting agent to limit chromium emissions from the affected source
 - Limit surface tension of the bath to not exceed 40 dynes/cm (stalagmometer)
- ✓ Decorative chromium electroplating tanks that use a trivalent chromium bath and are subject to §63.342(e).

Conducting the Test

You must notify the New York State Department of Environmental Conservation (DEC) of your intent to conduct an initial performance test 60 days prior to the actual testing date. You may conduct the initial performance test yourself according to the procedure outlined in the NESHAP, or hire a consultant to do it for you. Regardless of who conducts the test, you and your consultant must submit a protocol for the testing procedure to DEC for approval prior to testing.

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Reporting the Test Results

Following the initial performance test, whether you conduct it yourself or have a consultant do it for you, a report must be submitted to DEC that contains the following information:

- ✓ a description of your process
- ✓ descriptions of the sampling locations
- ✓ sampling and analysis procedures and any modifications to standard procedures
- ✓ test results
- ✓ quality assurance procedures and results
- ✓ records of:
 - operating conditions during testing
 - preparation of standards used during test
 - calibration procedures
- ✓ raw data sheets for:
 - field sampling
 - field and laboratory analysis
- ✓ documentation of calculations
- ✓ any additional information required by the test method

This report must be submitted to DEC at the address below, within 90 days of the completion date of your initial performance test:

*NYS Department of Environmental Conservation
Bureau of Air Quality Analysis & Research
625 Broadway, Albany, NY 12233-3259
518-402-8402*

Helping New York's Small Businesses understand and comply with environmental regulations.

Small Business Environmental Assistance Program

NYS ENVIRONMENTAL FACILITIES CORPORATION

625 Broadway, Albany, NY 12207-2997

1-800-780-7227 / 518-402-7461

sbeap@efc.ny.gov

The information in this fact sheet is intended for general reference only; it is not a full and complete statement of the technical or legal requirements associated with the regulation.