Sample Initial Notification for
Tennessee Plating and Polishing Facilities
(Not located in Davidson, Hamilton, Knox, Shelby Counties-check with local air program)

SECTION I: GENERAL INFORMATION

☐ Yes, I am subject to submitting this document to comply with 40 CFR Part 63 subpart WWWWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations 40 CFR 63 Subpart WWWWWW §63.11509(b) and 40 CFR 63 Subpart A, §63.9(b)

Compliance Date: ☐ Existing source: July 1, 2010
☐ New source: _______________ (Date of startup)

☐ No, I am NOT subject to 40 CFR Part 63 subpart WWWWWW. Reason not applicable:

If you checked the “No” box above, please complete this Section 1 and then proceed directly to Section 3 of this form (skip Section 2).

Company name
Facility name (if different):
Facility (physical location) address:
Owner name/title:
Owner/company address:
Owner telephone number: _______________ Owner email address (if available): _______________

Is the Operator the same person as the Owner? Yes ☐ No ☐
If the Operator information is different from the Owner, please provide the following:
Operator name/title:
Operator Address:
Operator telephone number: _______________ Operator email address (if available): _______________
SECTION 2: IDENTIFICATION OF AFFECTED OPERATIONS

(1) The following are the operations at this facility subject to subpart WWWW (check all that apply):

- Electroplating (noncyanide)
- Continuous electroplating (noncyanide)
- Short-term electroplating (noncyanide)
- Electropolishing
- Electroforming
- Electroplating (cyanide)
- Electroless nickel
- Chrome conversion coating
- Other electroless plating/coating/dipping
- Thermal spraying (permanent line)
- Thermal spraying (temporary, in-situ)
- Dry mechanical polishing

b Important Note: These operations are affected sources under subpart WWWW only if/when they use materials that contain or have the potential to emit Plating and Polishing metal HAP. Plating and Polishing HAP containing/potential is defined to be when the elemental form or compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, are used or have the potential to be emitted in quantities of 0.1 percent or more, or 1.0 percent or more for elemental or compounds of manganese.
The following table lists the compliance methods used on each affected tank process at this facility, noted previously in item (1) in Section 2:

<table>
<thead>
<tr>
<th>Tank Process Description/ID No.</th>
<th>HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)</th>
<th>Compliance Method(s) (Check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>describe:________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>describe:________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>describe:________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>describe:________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>describe:________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Management practices</td>
</tr>
<tr>
<td>Tank Process Description/ID No.</td>
<td>HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)</td>
<td>Compliance Method(s) (Check all that apply)</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>----------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Wetting agent/fume suppressant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Vented to a control device;</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Tank cover</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Time limit (short-term plating only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Management practices</td>
</tr>
</tbody>
</table>

(continued)
The following table lists each affected thermal spraying booths/lines (temporary and permanent), and dry mechanical polishing processes subject to subpart WWWW, noted previously in item (1) in Section 2:

<table>
<thead>
<tr>
<th>Thermal Spray Booth/Line or Dry Mechanical Polishing Description/ID No.</th>
<th>HAP Emitted or Used (Cd, Cr, Pb, Mn, Ni)</th>
<th>Compliance Method(s) (Check all that apply)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Vented to a control device; describe: ____________________</td>
</tr>
<tr>
<td></td>
<td></td>
<td>□ Management practices (temporary thermal spraying only)</td>
</tr>
</tbody>
</table>
The following applicable management practices are used at this facility, as practicable:

- Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- 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), as practicable.
- Use tank covers, if already owned and available at the facility, whenever practicable.
- Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- Minimize spills and overflow of tanks, as practicable.
- Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- Perform regular inspections to identify leaks and other opportunities for pollution prevention.
SECTION 3: CERTIFICATION

I hereby certify that the information presented herein is correct to the best of my knowledge.

__________________________    _______________________
(Signature)     (Date)

__________________________ (____)_______________________
(Name/title)        (Telephone No.)

If you have questions about these environmental regulations affecting your business, contact Donovan Grimwood with the Tennessee Small Business Environmental Assistance Program at 1-800-734-3916 or at BGSBEAP@tn.gov.

Submit the required information no later than October 29, 2008 to the following address:

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243