

40 CFR 63 Subpart N- Chromium Electroplating and Anodizing Processes: Ongoing Monitoring Under the NESHAP

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

This fact sheet provides a general overview of ongoing monitoring that chromium electroplating and anodizing operations must perform under federal requirements. 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.

Ongoing Monitoring

The NESHAP requires you to continuously monitor the operation of your air pollution control system to ensure ongoing compliance with the federal emission limits. As outlined in the table on the reverse side, you must regularly measure the same operating parameters that you (or your consultant) measure during the initial performance test and compare these new values to the standards set in your initial test. Exactly what parameters you must measure depends on the air pollution control technique you use to comply with the NESAHP. Decorative chromium electroplating operations using trivalent chromium baths are not required to conduct ongoing compliance monitoring.

Your ongoing compliance monitoring records will demonstrate you continuous compliance with the NESHAP to any enforcement agency, such as the New York State Department of Environmental Conservation (DEC) or the U.S. Environmental Protection Agency (EPA). The SBEAP can provide sample forms to use for ongoing monitoring, or you may develop your own.

Control Technique	Monitored Parameter ²	Frequency
Composite Mesh-Pad System	Pressure drop across system	One each day
Packed-Bed Scrubber	Pressure drop across system	One each day
	Velocity pressure at the system inlet	Once each day
Combined Composite Mesh-Pad System/Packed-Bed Scrubber	Pressure drop across the mesh-pad system	Once each day
Fiber-Bed Mist Eliminator	Pressure drop across the fiber-bed mist eliminator	Once each day
	Pressure drop across the control device upstream of the fiber-bed that prevents plugging	Once each day
Wetting Agent-Type or Combination Wetting Agent-Type/Foam Blanket Fume Suppressant	Surface tension of the bath	Every 4 hours ^{b,c}
Foam Blanket-Type Fume Suppressant	Thickness of the foam blanket	Once every hour ^{c,b}
Fume Suppressant/Add-On Control Device	<i>As identified above</i>	

- (a) Acceptable values for these monitored parameters are established during initial performance testing.
- (b) *If the surface tension remains below the maximum surface tension (40 dynes/cm [stalagometer], 33 dynes/cm [tensiometer]) after 40 hours of operation, then the monitoring frequency may be decreased to once every 8 hours.
*If the surface tension remains below the maximum for the next 40 hours, then the frequency can be decreased to once every 40 hours.
*If the surface tension exceeds the maximum at any time after that, then the initial monitoring schedule (every 4 hours) must be resumed.
- (c) The initial schedule must be resumed for every new tank solution.
- (d) *If the foam blanket thickness remains above the minimum thickness after 40 hours of operation, then the monitoring frequency may be decreased to once every 4 hours.
*If the foam blanket thickness remains above the minimum for the next 40 hours, then the frequency can be decreased to once every 8 hours.
*If the foam blanket thickness drops below the minimum at any time after that, then the initial monitoring schedule (every hour) must be resumed.

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