

40 CFR 63 Subpart N- Chromium Electroplating and Anodizing Processes: Recordkeeping 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 your facility must do to comply with the NESHAP depends on the size of your operation and what type of process you use (hard, decorative, anodizing), and what control technique you use.

This fact sheet provides a general overview of the recordkeeping 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.

Recordkeeping

The NESHAP requires that you keep records to demonstrate your continuing compliance with the emission limits in the regulation. *You must maintain the records that the table on the following page specifies.*

All records required by the NESHAP must be maintained at the facility for five years, and made available during any inspections by the New York State Department of Environmental Conservation (DEC) or the U.S. Environmental Protection Agency (EPA). If you operate a decorative chromium electroplating tank that uses a trivalent chromium bath, you need only to keep records of you purchases of bath components.

The SBEAP can provide sample recordkeeping forms, or you may develop your own.

Recordkeeping Requirements

1. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of § 63.342 (f) and Table 1 of § 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during inspection, and any actions taken to correct deficiencies found during the inspection.
2. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment, except routine housekeeping practices;
3. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment;
4. Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.342 (a)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;
5. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by § 63.342(f)(3)
6. Test reports documenting results of all performance tests;
7. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of § 63.344(e);
8. Records of monitoring data required by § 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected;

9. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment;
10. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during period other than malfunction of the process, add-on air pollution control, or monitoring equipment;
11. The total process operating time of the affected source during the reporting period;
12. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with § 63.342(c)(2);
13. For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressant are added to the electroplating or anodizing bath and records of the fume suppressant manufacturer and product name;
14. For sources complying with § 63.342(c), records of the bath components purchased, with the wetting agent clearly identified as a bath constituent contained in one of the components;
15. Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under § 63.10(f); **and**
16. All documentation supporting the notifications and reports required by §63.9, § 63.10, and § 63.347.

Note: All records shall be maintained for a period of 5 years in accordance with § 63.10(b)(1)

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