

Compliance Calendar for Florida Chromium Electroplaters 2020

This calendar is designed to assist Chromium Electroplater members with tracking of material usage and compliance assistance. It summarizes environmental regulations and provides a place for you to keep required records. Keep these records at your facility for five years.

Provided by: Small Business Environmental Assistance Program, DEP

Environmental Regulations

A written Operations and Maintenance Plan is required for all facilities except decorative chrome electroplating facilities using a trivalent chromium bath that incorporates a wetting agent as an ingredient. The standards applying to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

Emissions Reduction Technique	What to Monitor	How Often
Composite Mesh Pad (CMP) System	Pressure drop across CMP system	Once daily
Packed-Bed Scrubber (PBS)	Inlet velocity pressure and pressure drop across PBS	Once daily
PBS/CMP System	Pressure drop across CMP system	Once daily
Fiber-Bed Mist Eliminator (FBME)	Pressure drop across FBME and across upstream control used to prevent unplugging	Once daily
Wetting Agent-Type Fume Suppressant	Bath Surface Tension	Once every 40 hours
Foam Blankets	Foam Thickness	Once every 8 hours

Division of Air Resource Management

For Chromium Electroplaters operation questions, please contact the Small Business Environmental Assistance Program (SBEAP) at 1-800-722-7457, or by email: Small.Business@dep.state.fl.us.

- The SBEAP provides free and confidential assistance with environmental regulations.
- If it's located in Broward, Duval, Hillsborough, Miami-Dade, Orange, Palm Beach, Pinellas, or Sarasota counties, visit our Local Program at https://floridadep.gov/air/airdirector/content/local-program-aircontacts. For all other counties, go to our District Air Contacts, https://floridadep.gov/air/airdirector/content/district-air-contacts.



Example to Calculate the Cumulative Rectifier Capacity

Running Total from Last Month (previous 12 months total)	Enter running total from last month.	420,000
SUBTRACT July 2018 Data	Enter the amount from the same month last year, from last year's records or calendar.	65,000
ADD July 2019 Data	Add amount from the current month.	70,000
TOTAL	This is your 12-month running total	425,000

Criteria to Meet

Emission standards
Work practice standards
Monitoring requirements
Reporting requirements
Recordkeeping
Initial performance tests

January 2020

Calculate the Cumulative Rectifier Capacity						
Running Total from last Month (Previous 12 Month's Total)						
January 2019 (subtract)						
January 2020 (add)						
Total						

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

Surface Tension Record Keeping (Every 40 Hours)					
Date	Time	Surface Tension (DYNES/CM)			

January 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31	Inspections	
					Record Keeping	
					Monthly Ampere Usage	

Tips and Reminders: You can register, renew, change ownership or make administrative corrections to AGPs online. Air General Permit Electronic Registration System (AGPERS), http://www.fldepportal.com/go/home/.

• Extend process bath life—Test bath chemistry regularly. This will help you determine when more chemicals should be added or when impurities should be removed.

Calculate the Cumulative Rectifier Capacity						
Running Total from last Month (Previous 12 Month's Total)						
February 2019 (subtract)						
February 2020 (add)						
Total						

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)						
Date	Time	Surface Tension (DYNES/CM)					

February 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
Inspections Record Keeping Monthly Ampere Usage					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	

Tips and Reminders: Click here: Reprint a Receipt for an On-Line Payment, http://www.fldepportal.com/DepPortal/go/continue/.

• Extend process bath life - Lower process bath concentration levels. By experimenting and lowering levels to just above the point where defects start to occur, you can significantly reduce chemical costs.

Calculate the Cumulative Rectifier Capacity					
Running Total from last Month (Previous 12 Month's Total)					
March 2019 (subtract)					
March 2020 (add)					
Total					

	Foam Blanket Record Keeping (Every 8 Hours)							
	1							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

		Surface Tension Record Keeping (Every 40 Hours)
Date	Time	Surface Tension (DYNES/CM)

March 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
Inspections						1
Record Keeping						
Monthly Ampere Usage	<u></u>					
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31	Tip: To Make Adminis	trative Corrections to a	n Air General Permit, si	gn into DEP Business Po	ortal,
		http://www.fldepport	al.com/go/.			

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
April 2019 (subtract)							
April 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)						
Date	Time	Surface Tension (DYNES/CM)					

April 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30		Inspections	
					Record Keeping	
					Monthly Ampere Usage	2

Tips and Reminders: To Register or Renew an Air General Permit, go to the DEP Business Portal Air Facility page at http://www.fldepportal.com/go/home/ and sign in or register from the link in the upper right corner of the page.

• Extend process bath life - Use "purified" water instead of tap water for makeup. Contaminants in tap water can foul up bath chemistry and create extra sludge.

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
May 2019 (subtract)							
May 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)					
Date	Time	Surface Tension (DYNES/CM)				

May 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
Inspections Record Keeping Monthly Ampere Usage				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

Tips and Reminders: For more information on AGPs or assistance with using the online renewal, please contact DEP's Small Business Environmental Assistance Program at 1-800-722-7457.

• Extend process bath life - Cover the baths with lids when not in use to prevent unwanted materials from entering the baths.

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
June 2019 (subtract)							
June 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)						
Date	Time	Surface Tension (DYNES/CM)					

June 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30				Inspections Record Keeping Monthly Ampere Usage	

Tips and Reminders: For more information on AGPs or assistance with using AGPERS, please contact DEP's Small Business Environmental Assistance Program at 1-800-722-7457.

• Reduce chromium emissions - Switch to trivalent chrome or some other coating. Use mechanical agitation instead of air sparging. Add surface tension reducers to allow bubbles to dissipate before reaching the surface instead of bursting.

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
July 2019 (subtract)							
July 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)					
Date	Time	Surface Tension (DYNES/CM)				

July 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31	Inspections Record Keeping Monthly Ampere Usage	

Tips and Reminders: Compliance Assistance Information, <u>Chromium Facility Self-inspection Form</u>, https://floridadep.gov/air/permitting-compliance/documents/chromium-facility-self-inspection-form.

• Reduce chrome emissions - Add fume suppressants. Install a pollution control device such as a packed-bed scrubber, composite mesh pad system or fiber-bed mist eliminator. These require strict work practice standards including a formal operation and maintenance plan.

August 2020

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
August 2019 (subtract)							
August 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)					
Date	Time	Surface Tension (DYNES/CM)				

August 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY	
Inspections Record Keeping Monthly Ampere Usage					1	2	
3	4	5	6	7	8	9	
10	11	12	13	14	15	16	
17	18	19	20	21	22	23	
24	25	26	27	28	29	30	
31	Tips and Reminders: National Metal Finishing Resource Center, http://www.nmfrc.org/. • Reduce drag out - Remove parts slowly (~11 ft/min). This allows the solution to flow back into the process tank. For manual operations having hoists overhead can reduce worker fatigue due to slowly taking out heavy racks or parts.						

Calculate the Cumulative Rectifier Capacity							
Running Total from last Month (Previous 12 Month's Total)							
September 2019 (subtract)							
September 2020 (add)							
Total							

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)						
Date	Time	Surface Tension (DYNES/CM)					

September 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30			Inspections Record Keeping Monthly Ampere Usage	

- Tips and Reminders: You can register, renew, change ownership or make administrative corrections to AGPs online. <u>Air General Permit Electronic Registration System (AGPERS)</u>, http://www.fldepportal.com/go/home/.
- Reduce drag-out Drain boards can be placed over the lips of two adjacent tanks to catch any drips of drag-out when transferring parts. Slope the boards back to the first tank. This reduces drag out, keeping floors clean.

Calculate the Cumulative Rectifier Capacity						
Running Total from last Month (Previous 12 Month's Total)						
October 2019 (subtract)						
October 2020 (add)						
Total						

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

		Surface Tension Record Keeping (Every 40 Hours)
Date	Time	Surface Tension (DYNES/CM)

October 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
Inspections Record Keeping Monthly Ampere Usage			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

Tips and Reminders: You can register, renew, change ownership or make administrative corrections to AGPs online. <u>Air General Permit Electronic Registration</u>
System (AGPERS), http://www.fldepportal.com/go/home/.

• Rinse efficiency - Increasing rinse efficiency will reduce water and sewer bills and treatment costs. Rinse tanks should be sized as small as possible depending on the largest part or rack to be immersed. This improves rinse efficiency and reduces water usage.

Calculate the Cumulative Rectifier Capacity						
Running Total from last Month (Previous 12 Month's Total)						
November 2019 (subtract)						
November 2020 (add)						
Total						

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

	Surface Tension Record Keeping (Every 40 Hours)					
Date	Time	Surface Tension (DYNES/CM)				

November 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY	
Inspections Record Keeping Monthly Ampere Usage						1	
2	3	4	5	6	7	8	
9	10	11	12	13	14	15	
16	17	18	19	20	21	22	
23	24	25	26	27	28	29	
30	Tip: For more information on AGPs or assistance with using AGPERS, please contact DEP's Small Business Environmental Assistance Program at 1-800-722-7457.						

Calculate the Cumulative Rectifier Capacity						
Running Total from last Month (Previous 12 Month's Total)						
December 2019 (subtract)						
December 2020 (add)						
Total						

	Foam Blanket Record Keeping (Every 8 Hours)							
Date	Time	Thickness (Inches)	Date	Time	Thickness (Inches)			

Surface Tension Record Keeping (Every 40 Hours)								
Date	Time	Surface Tension (DYNES/CM)						

December 2020

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31		Inspections Record Keeping Monthly Ampere Usage	2

Tips and Reminders: You can register, renew, change ownership or make administrative corrections to AGPs online. <u>Air General Permit Electronic Registration</u>
System (AGPERS), http://www.fldepportal.com/go/home/.

• Hazardous materials storage - Label containers properly, include contents and generation date of hazardous waste. Make sure drums are easily accessible but not stored in high traffic areas where they can be easily knocked over. Regularly check for leaks.

Summary for EPA Regulations for Plating and Polishing Facilities, 40 CFR Part63 Subpart WWWWWW

EPA has new requirements to reduce air pollution from plating and polishing facilities. The vapor from these facilities contain Cadmium, Chromium, Manganese, Nickel, Lead, and other harmful chemicals that pose a health risk to anyone who breathes air containing them.

This is a short summary of things that plating and polishing operations must do to comply with the new rule requirements. For more details and assistance, please talk to your local environmental contact.

Specific Requirements

- Compliance dates: Existing sources by 07/01/10; New sources upon start-up
- Non-cyanide electroplating, electroforming or electro polishing with pH<12
 - o Use wetting agent/fume suppressant (WAFS), control device or tank cover
 - o Management practices to minimize or eliminate potential emissions
- Flash or short-term electroplating
 - o Use tank covers or limit plating time to 3 min/hr or 1 hr/day
 - o Management practices to minimize or eliminate potential emissions
- Dry mechanical polishing and thermal spraying (permanent operations)
 - Exhaust emissions to a control device
- Cyanide electroplating (pH ≥12), non-electrolytic plating and coating operations (such as electroless nickel plating and chromate conversion coating), and temporary thermal spraying:
 - o Management practices to minimize or eliminate potential emissions

Management Practices to Minimize or Eliminate Potential Emissions, as Practicable

- Keep tank liquid as still as you can when removing parts processed in the tank.
- Make the drip time as long as you can when removing parts from the tank. Use drain boards (also known as drip shields) or remove parts slowly from the tank.
- Design 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).
- Use tank covers whenever you can.
- Minimize or reduce heating of process tanks whenever possible.
- Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment.

- Minimize bath contamination however possible by not dropping parts or quickly recovering dropped parts, using distilled/de-ionized water, filtering the water, pre-cleaning the parts before plating and rinsing pre-treated parts before plating.
- Make sure that the chemicals and other bath ingredients are at the correct levels in the tank.
- Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and washdowns when needed.
- Minimize spills and overflow of tanks as much as possible.
- Use squeegee rolls in continuous or reel-to-reel plating tanks.
- Perform regular inspections to identify leaks and other ways to prevent pollution.

Reporting

- Prepare Annual Certification of Compliance report by January 31st of each year for the previous year. Submit by January 31st if any deviations occurred during the previous year.
- Prepare and submit Report of Deviations by January 31st of each year, if applicable.
- Submit Initial Notification:
- Existing sources on 10/29/08
 - o New sources on 10/29/08 or upon startup (correction: note rule will be revised)
- Submit Notification of Compliance Status:
 - o Existing sources on 07/01/10
 - o New sources upon start-up

Recordkeeping

- All required notifications and reports, with supporting data.
- Records that show you meet the management practices.
- For cyanide tanks, provide the one-time pH measurement value.
- For non-cyanide tanks, provide the amount and frequency of WAFS additions, if applicable.
- For short-term or flash electroplating tanks, the daily plating time.
- For electroplating tanks using covers as a control option, the time the tank is operated with cover in place.
- Records must be kept for a period of 5 years.

The rule itself can be found at this link:

http://www.ecfr.gov/cgi-bin/text-idx?SID=9a20aa9ed38e43fd20c9474543ede082&node=40:15.0.1.1.1.36&rgn=div6

District and County Air Program Contacts

Office	Location	Contact Person	Telephone	email
Northwest District	Pensacola	Carol Melton	850-595-0616	Carol.Melton@dep.state.fl.us
Northwest District	Pensacola	Blaine Mershon	850-595-0634	Blaine.Mershon@floridadep.gov
Northwest District Branch	Pensacola	Tracy White	850-245-7628	Tracy.A.White@dep.state.fl.us
Northeast District	Jacksonville	Marc Lovallo	904-256-1566	Marc.Lovallo@FloridaDEP.gov
Northeast District	Jacksonville	Chris Kirts	904-256-1553	Christopher.Kirts@FloridaDEP.gov
Southwest District	Tampa	Michael Lynch	813-470-5746	Michael.Lynch@dep.state.fl.us
Central District	Orlando	Daniel Hall	407-897-4167	Daniel.K.Hall@FloridaDEP.gov
Southeast District	West Palm Beach	Alannah Irwin	561-681-6626	Alannah.Irwin@FloridaDEP.gov
South District	Fort Myers	Katie O'Gara	239-344-5690	Katie.Ogara@FloridaDEP.gov
Miami-Dade County	Miami	Air Facilities	305-372-6925	AirFacilities@miamidade.gov
		Steven Bedoya	305-372-6825	Steven.Bedoya@miamidade.gov
Broward County	Plantation	D'Arcy Damveld-Ansel	954-519-1459	DDAMVELDANSEL@broward.org
Duval County	Jacksonville	Patricia Gee-Jones	904-255-7199	PATRICIA@coj.net
Hillsborough County	Tampa	Sahand Nasseri	813-627-2600, Extension 1355	nasseris@epchc.org
Palm Beach County	West Palm Beach	Jeff Dizek	561-837-5925	Jeff.Dizek@flhealth.gov
Pinellas County	Clearwater	Sherrill Culliver	727-464-4422	sculliver@pinellascounty.org
Orange County	Orlando	Ilka Bundy	407-836-1476	ilka.bundy@ocfl.net
Sarasota County	Sarasota	Michael Storino	941-861-0909	mstorino@scgov.net

The Chromium Electroplater Air General Permit is NOT TRANSFERABLE and does not follow a change in ownership of the facility. If you are a new owner and have not submitted a registration worksheet and/or have any permitting questions, please contact the Small Business Environmental Assistance Program at 1-800-722-7457.

You can register online electronically at: https://floridadep.gov/air/permitting-compliance/content/air-general-permits.

If you prefer to register manually by hardcopy, then print the "Chromium Electroplater Air General Permit Registration Worksheet" located at: https://floridadep.gov/air/permitting-compliance/content/chromium-electroplaters

Registrations and fees should be mailed to the following address:

FDEP Receipts
P.O. Box 3070
Tallahassee, FL 32315-3070