

## USEPA Updates

### New USEPA Regulations for Plating and Polishing Operations

On July 1, 2008 the United States Environmental Protection Agency adopted new requirements for plating and polishing facilities for area sources. Area sources, which are typically small businesses, are sources that emit, or have the potential to emit in the absence of controls, less than 10 tons per year (tpy) of any single hazardous air pollutant (HAP) or 25 tpy or less of any combination of HAP. This new rule includes management practices to minimize or eliminate possible emission and recordkeeping and reporting requirements.

#### Applicability

This rule applies to facilities that meet the following criteria:

- Uses a process that includes electroplating other than chromium electroplating; electroless or non-electrolytic plating; other non-electrolytic metal coating (such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing and manganese phosphate coating) and thermal spraying; dry mechanical polishing; electroforming; and electropolishing.
- Uses or has emissions of the following metal hazardous air pollutants (HAPs): cadmium, chromium, lead, manganese, and nickel. This does not include plating or polishing processes that use materials with less than 0.1% in weight of cadmium, chromium, lead, or nickel and less than 1.0% of manganese as reported on the Material Safety Data Sheet for that material.

#### Compliance Requirements

The following is a brief summary of some of the compliance requirements in this new rule. You should refer to the rule for a more detailed description of all of the new requirements; the rule can be found at

<http://www.epa.gov/fedrgstr/EPA-AIR/2008/July/Day-01/a14795.pdf>

- Electrolytic tanks are required to use wetting agent/flame suppressant in the bath chemistry and to capture tank emissions.

- Short term flash electroplating tanks must limit their plating to no more than one hour per day or three minutes per hour and must use a tank cover for at least 95% of the plating time.
- Tanks that use cyanide in the plating bath, and that have a pH of 12 or greater must measure the pH on set up and follow all of the rules general management practices.
- Dry polishing operations must capture particulate material and control these emissions through the use of a cartridge, fabric, or HEPA filter.
- Thermal spray operations must capture and control their particulate material.

#### Management Practices

All facilities covered by this rule must implement management practices that are designed to minimize their emissions. These practices include:

- Minimizing agitation when removing parts
- Maximize dripping solution back into tanks
- Optimize design of barrels, racks, and parts to decrease drag out
- Use tank covers whenever practicable
- Minimize or reduce heating at all times
- Regular maintenance of tanks
- Minimize bath contamination
- Maintain quality control of chemicals
- Minimize spills and overflows

Included in these requirements is an **initial notification report** that is **due by October 30, 2008**. This notification includes a description of the compliance methods that are used at the facility. A notification form is currently being drafted and will be available soon. The notification report should be sent to the USEPA Region 5 and the Illinois EPA. Compliance with the rule is required by July 1, 2010.

For more information on this rule, 40 CFR 63 subpart WWWW, you may contact USEPA Region 5 at 312-886-6812. You can get a copy of the entire rule text at <http://www.epa.gov/fedrgstr/EPA-AIR/2008/July/Day-01/a14795.pdf>

## Illinois Updates

### **New Requirements for Vehicle Recyclers, Vehicle Crushers, and Scrap Metal Processors**

Beginning on September 1, 2008, all facilities that recycle vehicles will be **required to remove mercury switches** before crushing or scrapping the vehicles. If for some reason, mercury switches are not removed prior to receiving the vehicle, vehicle crushers and scrap metal processors are required to remove them. While this program had been voluntary, the new mandate to remove mercury switches comes with a bonus - **recycled mercury switches will now be worth \$2 each**.

The automotive industry created End of Life Vehicle Solutions (ELVS) to manage and recycle the collected switches. Information on how to participate in the ELVS program and proper removal and storage of switches can be found at the ELVS website:  
<http://www.elvsolutions.org/index.htm>.

ELVS also provides collection buckets and pays for the cost of shipping and recycling the switches removed by dismantlers and scrap metal recyclers. Information on which vehicles contain switches, switch locations, and switch removal will be sent with the bucket. The Illinois Environmental Protection Agency (Illinois EPA) is also developing a guidance manual that will be mailed to recyclers, crushers, and scrap metal processors in August 2008.

Recyclers, crushers, and scrap metal processors will be required to maintain records and submit annual reports to the IEPA of the number of vehicles recycled, number of switches removed, and number of vehicles received. The IEPA mails annual reporting forms in July of every year, and the reports must be submitted to the Illinois EPA by August 15<sup>th</sup> of every year.

For more information about the new requirements in Illinois you may contact Becky Jayne at the Illinois EPA at 217/524-9642. You may also contact the Small Business Environmental Assistance Program at 800/252-3998 (TDD: 800/785-6055) or via e-mail at [dceo.sbeap@illinois.gov](mailto:dceo.sbeap@illinois.gov)

### **Proposed rule changes impacting used oil recyclers and transporters**

The Illinois Pollution Control Board recently proposed amendments to the special waste and uniform hauling programs that will have an impact on used oil recyclers and used oil transporters. As proposed, these amendments will result in a **reduction of paperwork requirements**. In this rulemaking, the Board has proposed to exempt used oil that is handled under the federal guidelines for used oil (found in 35 Ill. Adm. Code 739 "Standards for the Management of Used Oil") from the manifest requirements of the nonhazardous special waste and uniform hauling program. Additionally, the amendments will exempt shipments that contain only used oil from the special waste hauling permit requirements. Again, these shipments must still be managed in accordance with the regulations found in Part 739.

The full amendments can be seen at:  
<http://www.ipcb.state.il.us/SLR/RulemakingsPendingBeforetheBoard.asp>

If you have questions about this rulemaking you can contact the Pollution Control Board's hearing officer, Tim Fox, at 312-814-6085. You may also contact the Small Business Environmental Assistance Program at 800/252-3998 (TDD: 800/785-6055) or via e-mail at [dceo.sbeap@illinois.gov](mailto:dceo.sbeap@illinois.gov)

### **Environmental issues stemming from the recent flooding in Illinois**

The Illinois EPA has compiled a fact sheet to assist people with environmental questions on cleaning up after the recent flooding in Illinois. Topics covered by this fact sheet include dealing with flood garbage, recycling flood waste,

identification of items that can be sent to a landfill and detailed information on burning flood waste. In this fact sheet the Illinois EPA explains that it has taken action to classify flood debris as Pollution Control Waste - a designation that means that the waste generated from the cleanup after the flooding will be exempt from solid waste disposal fees.

This fact sheet is available on the IEPA's website at <http://www.epa.state.il.us/land/floods/index.pdf>  
If you have any questions you can contact the Small Business Environmental Assistance Program at 800/252-3998 (TDD: 800/785-6055) or via e-mail at [dceo.sbeap@illinois.gov](mailto:dceo.sbeap@illinois.gov).

### **Fall is just around the corner, check your home for radon**

Radon is an indoor air pollutant; it is a colorless, odorless radioactive gas that comes from uranium in the soil. The only way to tell if you have radon is to test. **For non-smokers, radon is the first leading cause of lung cancer** and for smokers, it is the second.

The Illinois Emergency Management Agency Radon Program is offering **free radon test kits**. By logging onto [www.radon.illinois.gov](http://www.radon.illinois.gov) you can request a free test kit. You can also call the toll free number at 1-800-325-1245 for radon information or to order a kit by phone. If you are in a real estate transaction, do not use a test kit, but hire a licensed radon measurement professional. Be aware that Radon Awareness Act requires anyone selling a home, condominium or other residential property in Illinois to provide information about indoor radon exposure and the fact that radon is the leading cause of lung cancer in non-smokers and the second leading cause overall. Taking care of the radon issue is one way to achieve a healthy indoor air environment!

### **DID YOU FORGET?**

**All dry cleaners** in Illinois are required to submit the new perc dry cleaning compliance report to the Illinois Environmental Protection Agency by July 28, 2008. If you haven't filed it yet don't forget to get it in right away! Copies of the report are included in the 2008 Dry Cleaner calendar, or you can request a copy from the Small Business Environmental Assistance Program at 800/252-3998 (TDD: 800/785-6055) or via e-mail at [dceo.sbeap@illinois.gov](mailto:dceo.sbeap@illinois.gov)

### **Upcoming Events**

Please mark your calendars and plan to attend. The University of Illinois will be hosting a **Biofuels and Sustainability Conference** in Champaign, Illinois on October 21 and 22nd. For more information see the conference web page at: <http://www.wmrc.uiuc.edu/BiofuelsConference/> or contact Dr. Tim Lindsey at the University of Illinois Sustainable Technology Center at 217/217-333-8940 or [tlindsey@wmrc.uiuc.edu](mailto:tlindsey@wmrc.uiuc.edu)

### **Asbestos Removal & Fire Fighter Training Burns**

Municipalities and local fire departments should be aware that **any structure burned for firefighter training is considered institutional use and is regulated under the Federal Asbestos NESHAP**. The structure must be inspected and all asbestos removed with the appropriate 10 asbestos notification filed with the IEPA Bureau of Air in order to receive an open burning permit to conduct the training. For more information you may contact Alan Grimmett, IEPA Asbestos Unit at 217-557-1438 or the Illinois Small Business Environmental Assistance Program at 800-252-3998.