PROPOSED AMENDED RULE 1469.

HEXAVALENT CHROMIUM EMISSIONS FROM CHROMIUM ELECTROPLATING AND CHROMIC ACID ANODIZING OPERATIONS

(a) Purpose

The purpose of this rule is to reduce point and fugitive hexavalent chromium emissions from facilities that perform chromium electroplating or chromic acid anodizing operations and other activities that are generally associated with chromium electroplating and chromic acid anodizing operations.

(ab) Applicability

(1) This rule shall apply to the owner or operator of any facility performing chromium electroplating or chromic acid anodizing. Compliance with this rule shall be in addition to other applicable rules, such as Rule 1401 – New Source Review of Toxic Air Contaminants and Rule 1401.1 – Requirements for New and Relocated Facilities Near Schools.

(2) Any person who sells, supplies, offers for sale, uses, or manufactures for sale in the District a chromium electroplating or chromic acid anodizing kit.

(bc) Definitions

For the purposes of this rule, the following definitions shall apply:

(1) ADD-ON AIR POLLUTION CONTROL DEVICE means equipment installed in the ventilation system of chromium electroplating and anodizing Tier I or Tier II Hexavalent Chromium-Containing tanks for the purposes of collecting and containing chromium emissions from the tank.

(2) AIR POLLUTION CONTROL TECHNIQUE means any method, such as an add-on air pollution control device, alternative add-on air pollution control device, mechanical fume suppressant or a chemical fume suppressant, that is used to reduce chromium emissions from a chromium electroplating and chromic acid anodizing Tier I or Tier II Hexavalent Chromium-Containing tanks.

(3) ALTERNATIVE ADD-ON AIR POLLUTION CONTROL DEVICE means equipment installed at any Tier I or Tier II Hexavalent Chromium-
Containing Tank for the purposes of collecting and containing chromium emissions such as an emission elimination device (e.g., merlin hood cover, tank cover).

(34) AMPERE-HOURS means the integral of electrical current applied to an electroplating tank (amperes) over a period of time (hours).

(45) ANNUAL PERMITTED AMPERE-HOURS means the maximum allowable chromium electroplating or anodizing rectifier production in ampere-hours, on an annual basis as specified in the Permit to Operate, Permit to Construct, or Compliance Plan for the facility.

(6) APPROVED CLEANING METHOD means cleaning using a wet mop, damp cloth, or using a high efficiency particulate arrestor (HEPA) vacuum.

(57) AREA SOURCE means any stationary source of hazardous air pollutants that is not a major source as defined in this rule.

(68) BASE MATERIAL means the metal, metal alloy, or plastic that comprises the workpiece.

(9) BARRIER means a physical divider free of holes, tears, and gaps that is constructed such that it prevents air flows from influencing the collection efficiency of an add-on air pollution control device.

(710) BATH COMPONENT means the trade or brand name of each component in trivalent chromium electroplating baths, including the chemical name of the wetting agent contained in that component.

(811) BREAKDOWN means an unforeseeable impairment of an air pollution control device or related operating equipment which causes a violation of any emission limitation or restriction prescribed by this rule or by State law and which: is not the result of neglect or disregard of any air pollution control law, rule, or regulation; is not intentional or the result of negligence, or improper maintenance; is not a recurrent breakdown of the same equipment; and, does not constitute a nuisance as defined in the State of California Health and Safety Code, Section 41700, with the burden of proving the criteria of this section placed upon the person seeking to come under the provisions of this law.

(12) BUILDING ENCLOSURE means a permanent containment structure, completely enclosed with a floor, four walls, and a roof to prevent exposure to the elements, (e.g., precipitation, wind, run-off), with limited openings to allow access and egress for people, vehicles, equipment, pieces, or parts that is free of breaks, cracks, or gaps, or deterioration that
could cause or result in fugitive hexavalent chromium emissions.

CHEMICAL FUME SUPPRESSANT means any chemical agent that reduces or suppresses fumes or mists at the surface of an electroplating or anodizing bath; another term for fume suppressant is mist suppressant.

CHROMIC ACID means the common name for chromium anhydride (CrO$_3$).

CHROMIC ACID ANODIZING means the electrolytic process by which an oxide layer is produced on the surface of a base material for functional purposes (e.g., corrosion resistance or electrical insulation) using a chromic acid solution. In chromic acid anodizing, the part to be anodized acts as the anode in the electrical circuit, and the chromic acid solution, with a concentration typically ranging from 50 to 100 grams per liter (g/L), serves as the electrolyte.

CHROMIUM ELECTROPLATING OR CHROMIC ACID ANODIZING TANK means the receptacle or container in which hard or decorative chromium electroplating or chromic acid anodizing occurs.

CHROMIUM ELECTROPLATING OR CHROMIC ACID ANODIZING KIT means chemicals and associated equipment for conducting chromium electroplating or chromic acid anodizing including, but not limited to, internal and external tank components.

COMPOSITE MESH-PAD SYSTEM (CMP) means an add-on air pollution control device typically consisting of several mesh-pad stages. The purpose of the first stage is to remove large particles. Smaller particles are removed in the second stage, which consists of the composite mesh pad. A final stage may remove any re-entrained particles not collected by the composite mesh pad.

DECORATIVE CHROMIUM ELECTROPLATING means the process by which a thin layer of chromium (typically 0.003 to 2.5 microns) is electrodeposited on a base metal, plastic, or undercoating to provide a bright surface with wear and tarnish resistance. In this process, the part(s) serves as the cathode in the electrolytic cell and the solution serves as the electrolyte. Typical current density applied during this process ranges from 540 to 2,400 Amperes per square meter (A/m$^2$) for total electroplating times ranging between 0.5 to 5 minutes.

DRAGOUT means fluid containing hexavalent chromium that drips off from parts being electroplated or anodized, or from equipment used to

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remove electroplated or anodized parts from a tank.

(21) **EARLY EDUCATION CENTER** means any public or private property, used for purposes of education as defined as an Early Learning and Developmental Program by the U.S. Department of Education, but does not include any property in which education is primarily conducted in private homes. Early education center includes any building or structure, playground, athletic field, or other areas of early education center property.

(162) **ELECTROPLATING OR ANODIZING BATH** means the electrolytic solution used as the conducting medium in which the flow of current is accompanied by movement of metal ions for the purpose of electroplating metal out of the solution onto a workpiece or for oxidizing the base material.

(172) **EMISSION LIMITATION** means, for the purposes of this rule, the concentration of total chromium allowed to be emitted expressed in milligrams per dry standard cubic meter (mg/dscm), or the allowable surface tension expressed in dynes per centimeter (dynes/cm) for decorative chromium electroplating and chromic acid anodizing tanks; and the milligrams of hexavalent chromium per ampere-hour (mg/amp-hr) of electrical current applied to the electroplating tank for hard or decorative chromium electroplating tanks or chromic acid anodizing tanks, or mass emission rate.

(182) **ENCLOSED STORAGE AREA** is any space or structure used to contain material that prevents its contents from being emitted into the atmosphere.

(192) **EXISTING FACILITY** means a facility that is in operation before October 24, 2007.

(202) **FACILITY** means the major or area source at which chromium electroplating or chromic acid anodizing is performed and/or any source or group of sources or other air contaminant-emitting activities which are located on one or more contiguous properties within the District, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person (or by persons under common control), or an outer continental shelf (OCS) source as determined in 40 CFR Section 55.2. Such above-described groups, if noncontiguous, but connected only by land carrying a pipeline, shall not be considered one facility. Sources or installations involved in crude oil and gas production in Southern California Coastal or OCS Waters and transport
of such crude oil and gas in Southern California Coastal or OCS Waters shall be included in the same facility which is under the same ownership or use entitlement as the crude oil and gas production facility on-shore.

(242) FIBER-BED MIST ELIMINATOR means an add-on air pollution control device that removes contaminants from a gas stream through the mechanisms of inertial impaction and Brownian diffusion. This device is typically installed downstream of another control device, which serves to prevent plugging, and consists of one or more fiber beds. Each bed consists of a hollow cylinder formed from two concentric screens; the fiber between the screens may be fabricated from glass, ceramic, plastic, or metal.

(222) FOAM BLANKET means the type of chemical fume suppressant that generates a layer of foam across the surface of a solution when current is applied to that solution.

(232) FRESH WATER means water, such as tap water, that has not been previously used in a process operation or, if the water has been recycled from a process operation, it has been treated and meets the effluent guidelines for chromium wastewater.

(243) FUGITIVE DUST, for the purpose of this rule means any solid particulate matter containing hexavalent chromium that becomes airborne by natural or man-made activities, excluding particulate matter emitted from an exhaust stack.

(253) HARD CHROMIUM ELECTROPLATING or INDUSTRIAL CHROMIUM ELECTROPLATING means a process by which a thick layer of chromium (typically greater than 1.0 microns) is electrodeposited on a base material to provide a surface with functional properties such as wear resistance, a low coefficient of friction, hardness, and corrosion resistance. In this process, the part serves as the cathode in the electrolytic cell and the solution serves as the electrolyte. Hard chromium electroplating process is performed at current densities typically ranging from 1,600 to 6,500 A/m² for total electroplating times ranging from 20 minutes to 36 hours depending upon the desired plate thickness.

(263) HEXAVALENT CHROMIUM means the form of chromium in a valence state of +6.

(273) HIGH EFFICIENCY PARTICULATE ARRESTORS (HEPA) means filter(s) that are individually dioctyl phthalate tested (or equivalent) with
0.3 micron particles, and rated by the manufacturer to have a control efficiency of not less than 99.97 percent or more efficient in collecting particle sizes 0.3 microns or larger.

(34) HIGH EFFICIENCY PARTICULATE ARRESTOR (HEPA) VACUUM means a vacuum that utilizes HEPA filters.

(283) LEAK means the release of chromium emissions from any opening in the emission collection system prior to exiting the emission control device.

(293) MAJOR SOURCE means any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

(303) MAXIMUM CUMULATIVE POTENTIAL RECTIFIER CAPACITY means the summation of the total installed rectifier capacity associated with the hard chromium electroplating tanks at a facility, expressed in amperes, multiplied by the maximum potential operating schedule of 8,400 hours per year and 0.7, which assumes that electrodes are energized 70 percent of the total operating time. The maximum potential operating schedule is based on operating 24 hours per day, 7 days per week, 50 weeks per year.

(313) MECHANICAL FUME SUPPRESSANT means any device, including but not limited to polyballs, that reduces fumes or mist at the surfaces of an electroplating or anodizing bath by direct contact with the surface of the bath. Polyballs are the most commonly used mechanical fume suppressant.

(323) MODIFICATION means either:

(A) any physical change in, change in method of operation of, or addition to an existing permit unit subject to this rule that requires an application for a permit to construct and/or operate and results in an increase in hexavalent chromium emissions. Routine maintenance and/or repair shall not be considered a physical change. A change in the method of operation of equipment, unless previously limited by an enforceable permit condition, shall not include:

(i) an increase in the production rate or annual ampere-hours, unless such increases will cause the maximum design
capacity of the equipment to be exceeded, or will cause a
facility to be subject to a different requirement in Table 2-1 of paragraph (eh)(4(2)); or
(ii) an increase in the hours of operation; or
(iii) a change in ownership of a source;
(B) the addition of any new chromium electroplating or anodizing tank
at an existing facility which increases hexavalent chromium emissions; or
(C) the fixed capital cost of the replacement of components exceeding
50 percent of the fixed capital cost that would be required to
construct a comparable new source.

MODIFIED FACILITY means any facility which has undergone a
modification on or after October 24, 2007.

NEW FACILITY means any facility that begins initial operations on or
after October 24, 2007. “New Facility” does not include the installation of
a new chromium electroplating or anodizing tank at an existing facility or
the modification of an existing facility.

OPERATING PARAMETER VALUE means a minimum or maximum
value established for a control device or process parameter which, if
achieved by itself or in combination with one or more other operating
parameter values, determines that an owner or operator is in continual
compliance with the applicable emission limitation or standard.

PACKED-BED SCRUBBER means an add-on air pollution control device
consisting of a single or double packed-bed that contains packing media on
which the chromic acid droplets impinge. The packed-bed section of the
scrubber is followed by a mist eliminator to remove any water entrained
from the packed-bed section.

PERFLUOROOCTANE SULFONIC ACID (PFOS) BASED FUME
SUPPRESSANT means a fume suppressant that contains 1 percent or
greater PFOS by weight.

RESPONSIBLE OFFICIAL means one of the following:

(A) For a corporation: A president, secretary, treasurer, or vice
president of the corporation in charge of a principal business
function, or any other person who performs similar policy or
decision-making functions for the corporation, or a duly authorized
representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities and either:

(i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars); or

(ii) The delegation of authority to such representative is approved in advance by the U. S. EPA Administrator.

(B) For a partnership or sole proprietorship: a general partner or the proprietor, respectively.

(C) For a municipality, state, Federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of the U.S. Environmental Protection Agency [U.S. EPA]).

(D) For sources (as defined in this rule) applying for or subject to a Title V permit: “responsible official” shall have the same meaning as defined in District’s Regulation XXX.

SCHOOL means any public or private school, including juvenile detention facilities with classrooms, used for purposes of the education of more than 12 children at the school, including in kindergarten and grades 1 through 12, inclusive, but does not include any private school in which education is primarily conducted in private homes. The term includes any building or structure, playground, athletic field, or other area of school property, but does not include unimproved school property.

SCHOOL UNDER CONSTRUCTION means any property that meets any of the following conditions.

(A) construction of a school has commenced; or

(B) a CEQA Notice for the construction of a school has been issued; or

(C) a school has been identified in an approved local government specific plan.

SENSITIVE RECEPTOR means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools;
daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

SOURCE means any chromium electroplating or chromic acid anodizing operation and any equipment or materials associated with the selected associated air pollution control technique.

STALAGMOMETER means a device used to measure the surface tension of a solution by determining the number of drops, or the weight of each drop, in a given volume of liquid.

SUBSTANTIAL USE of a permit to construct means one or more of the following:

(A) the equipment that constitutes the source has been purchased or acquired;

(B) construction activities, other than grading or installation of utilities or foundations, have begun and are continuing; or

(C) a contract to complete construction of the source within one year has been entered into.

SURFACE TENSION means the property, due to molecular forces, that exists in the surface film of all liquids and tends to prevent liquid from spreading.

TANK OPERATION means the time in which current and/or voltage is being applied to a chromium electroplating tank or a chromic acid anodizing tank.

TANK PROCESS AREA means the area where any Tier I or Tier II Hexavalent Chromium-Containing Tank and any associated process tanks are located.

TENSIOMETER means a device used to measure the surface tension of a solution by measuring the force necessary to pull a filament or ring from the surface of a liquid.

TIER I HEXAVALENT CHROMIUM-CONTAINING TANK means a tank containing a hexavalent chromium concentration of [TBD] parts per million (ppm) or greater.

TIER II HEXAVALENT CHROMIUM-CONTAINING TANK means a Tier I Hexavalent Chromium-Containing Tank that meets one or more of the following criteria:

(A) Operating temperature above [TBD]° Fahrenheit;
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(B) Uses air sparging as an agitation method; or
(C) Is electrolytic.

TRIVALENT CHROMIUM means the form of chromium in a valence state of +3.

TRIVALENT CHROMIUM PROCESS means the process used for electrodeposition of a thin layer of chromium onto a base material using a trivalent chromium solution instead of a chromic acid solution.

WEEKLY means at least once every seven calendar days.

WETTING AGENT means the type of chemical fume suppressant that reduces the surface tension of a liquid.

Requirements

(1) The owner or operator of a chromium electroplating tank, chromic acid anodizing tank, or group of such tanks, shall equip each tank with a continuous recording, non-resettable, ampere-hour meter that operates on the electrical power lines connected to the tank or group of tanks. A separate meter shall be hard wired for each rectifier.

(2) The owner or operator of a source with any chromium electroplating or chromic acid anodizing tank using a wetting agent chemical fume suppressant shall use only wetting agent chemical fume suppressants certified pursuant to subdivision (f).

(3) No Tier I or Tier II Hexavalent Chromium-Containing Tank electroplating or chromic acid anodizing tank shall be air sparged when electroplating is not occurring, or while chromic acid is being added unless approved in writing by the Executive Officer and conducted under the following conditions:

(A) Tier I or Tier II Hexavalent Chromium-Containing Tanks shall not be air sparged when the tank is not in use, and shall only be air sparged up to one hour prior to parts being placed in the tank, and one hour after parts are removed from the tank;

(B) Air sparging shall not occur when chromic acid powder, chromic acid flakes, or any other tank constituent containing hexavalent chromium is being added to the tank bath; and

(C) Tanks shall be operated with control devices and/or control methods as approved by the Executive Officer during air sparging.
(e) Requirements for Building Enclosures

Beginning [30 days after Date of Rule Adoption], the owner or operator of a facility that performs chromium electroplating or chromic acid anodizing shall:

1. Operate any Tier I or Tier II Hexavalent Chromium-Containing Tank and associated process tanks within a building enclosure;

2. Minimize cross-draft conditions that can lead to release of fugitive dust emissions from passages, doorways, and bay doors by installing automatic roll-up doors, plastic strip-curtains, or vestibules for doors and openings in the building enclosure. Alternative methods to minimize release of fugitive hexavalent chromium emissions from the building enclosure may be used if the owner or operator can demonstrate to the Executive Officer (an) equivalent or more effective method(s) to minimize cross-draft conditions.

3. Close all roof openings that are located within 30 feet of any edge of a Tier I or Tier II Hexavalent Chromium Containing Tank except to allow access or egress for equipment, pieces, or parts.

4. Prohibit operation of any device in any roof opening that pulls air from the building enclosure to the ambient air.

5. Design and operate all building enclosures in a manner that does not conflict with requirements set for by the federal Occupational Safety and Health Administration (OSHA) or the California Division of Occupational Safety and Health (CAL-OSHA) regarding working safety.

6. Inspect any building enclosure at least once a calendar month for breaks, cracks, gaps, or deterioration that could cause or result in fugitive hexavalent chromium emissions.

7. Repair any breaks, cracks, gaps, or deterioration that could or results in fugitive hexavalent chromium emissions from any building enclosure within 72 hours of discovery. The Executive Officer may approve a request for an extension beyond the 72-hour limit if the request is submitted before the 72-hour time limit has expired, and the owner or operator can provide information to substantiate that either:

   A) the repair will take longer than 72 hours; or
   B) the equipment, parts, or materials needed for the repair cannot be obtained within 72 hours.
Proposed Amended Rule 1469 (Cont.)  (Pending Amendment December 1, 2017)

(4)(f) Housekeeping Requirements:

An owner or operator of a facility that performs hexavalent-chromium electroplating or chromic acid anodizing facility shall:

(1) Store chromic acid powder or flakes, or other substances that may contain hexavalent chromium, in a closed container in an enclosed storage area when not in use.²

(2) Use a closed container when transporting chromic acid powder or flakes from an enclosed storage area to electroplating or anodizing tanks.²

(3) Clean-up, using an approved cleaning method, or contain any liquid or solid material that may contain hexavalent chromium that is spilled immediately and no longer than one hour after being spilled.²

(4) Clean, using an approved cleaning method, surfaces within the enclosed storage area, open floor area, walkways around the electroplating or anodizing Tier I or Tier Hexavalent Chromium-Containing Tank(s), or any surface potentially contaminated with hexavalent chromium or surfaces that potentially accumulate dust at least once every seven days daily in using an approved cleaning method or one of the following manners: HEPA vacuumed, hand wiped with a damp cloth, wet mopped, or maintained with the use of non-toxic chemical dust suppressants, and.

(5) Store, dispose of, recover, or recycle chromium or chromium-containing wastes generated from housekeeping activities and best management practices of subdivision (f) and (g) using practices that do not lead to fugitive dust. Containers that receive material shall be kept closed at all times except when filling or emptying.

(6) For any buffing, grinding, or polishing area:

(A) Install a physical barrier to separate the buffing, grinding, or polishing area within a facility from the hexavalent chromium electroplating or anodizing operation. The barrier may take the form of plastic strip curtains. Conduct all buffing, grinding, or polishing within a building enclosure and beyond 10 feet of any opening within the building enclosure.

(B) On each day when buffing, grinding, or polishing are conducted, clean, using an approved cleaning method, floors within 30 feet of a buffing, grinding, or polishing workstation and any entrance/exit point of a building enclosure.
(GC) Prohibit compressed air cleaning or drying operations shall not be conducted at or adjacent to within 30 feet of any the buffing, and grinding or polishing areas or the hexavalent—chromium electroplating or chromic acid anodizing operations unless a barrier separates those areas from the compressed air cleaning or drying operation such that particulates from those areas do not become airborne as a result of any compressed air cleaning or drying operation.

(7) Clean, using an approved cleaning method, any suspected chromic acid residue in the tank process area within 24 hours of the owner or operator observing the residue. A visible stain that cannot be removed or cleaned using an approved cleaning method shall be noted in the facility’s maintenance log documenting the date of discovery, location of the stain, and the type of approved cleaning method used. The owner or operator shall replace the part that was stained or paint over the stain within 30 days of discovery.

(8) Remove any flooring in the tank process areas that is made of fabric or fibrous materials, such as carpets or rugs, where hexavalent chromium containing materials can become trapped and difficult to clean.

(g) Best Management Practices

(H) The owner or operator of a facility that performs chromium electroplating or chromic acid anodizing shall minimize dragout outside of the electroplating or anodizing tanks or Tier I or Tier II Hexavalent Chromium-Containing Tank by implementing the following practices:

(A) Facilities with automated lines shall have drip trays, or other containment mechanism(s), installed between the electroplating or anodizing Tier I and Tier II Hexavalent Chromium-Containing tanks so that the liquid does not fall through the space between tanks. Trays shall be placed such that the liquid is captured and returned to the tank(s), and cleaned such that there is no accumulation of visible dust on the drip tray or equipment used for other containment mechanism(s) potentially contaminated with hexavalent chromium.

(B) Facilities without automated lines shall handle each electroplated or anodized part, or equipment used to handle such parts, so that
chromium laden liquid, including chromic acid, is not dripped outside the electroplating or anodizing tanks, including associated process tanks. Facilities spraying down parts over the electroplating or anodizing tank(s) to remove excess chromic acid shall have a splash guard installed at the tank to minimize overspray and to ensure that any hexavalent chromium laden liquid is captured and returned to the electroplating or anodizing tank. Splash guards shall be cleaned such that there is no accumulation of visible dust potentially contaminated with hexavalent chromium.

(2) The owner or operator of a facility that performs chromium electroplating or chromic acid anodizing shall not rinse above a tank, parts or equipment that contain chromium laden liquid using a water spray unless the chromium laden parts or equipment are submerged in a tank where the overspray and all liquid is captured in the tank or the following conditions are met:

(A) All water used in the rinsing process is captured in a tank or is physically contained;
(B) The area where the water spraying occurs contains splash guards that have a minimum of three sides that are free of holes, tears or openings. Splash guards shall be rinsed with water at least weekly, such that there is no accumulation of visible dust potentially contaminated with hexavalent chromium; and
(C) A low pressure nozzle is used and operated in a manner that water flows off of the part or equipment and there is no overspray of water during the rinsing process.

(3) Label any tank within the tank process area with a tank number or other identifier, bath contents, maximum concentration (ppm) of hexavalent chromium, operating temperature range, and any agitation methods used.

(4) Beginning [30 days after Date of Adoption], the owner or operator of a facility that performs chromium electroplating or chromic acid anodizing shall:

(A) Install a permanent cover that is free of holes, tears, or gaps for any Tier I Hexavalent Chromium-Containing Tank, unless the tank is controlled using an air pollution control technique approved by the Executive Officer, such as a certified fume suppressant or vented to a permitted add-on air pollution control device.
(B) Close covers on Tier I Hexavalent Chromium-Containing Tanks, as required by subparagraph (g)(4)(A), when the tank is not in use.

(5) Install a barrier to separate the buffing, grinding, or polishing area within a facility from the chromium electroplating or chromic acid anodizing operation. The barrier may take the form of plastic strip curtains.