Other commenters suggested that monitoring be tied to production rate, that monitoring be conducted only on days when electroplating is taking place, or that monitoring requirements be reduced after the source has been in compliance for 6 months. Commenters also requested that monitoring be required only during tank operation, and that tank operation be defined. Several commenters disagreed with the proposed inspection frequency because of increased exposure hazards to persons conducting the inspections or of anticipated down-time due to the inaccessibility of control systems.

In response to these comments and to minimize the burden on regulated sources, the EPA has reduced the burden associated with the compliance monitoring and work practice standards in the final rule. The final rule continues to require daily monitoring of pressure drop and velocity pressure for compliance, but the monitoring procedures specified in the rule are the minimum required to determine continuous compliance. Once the monitoring devices are in place, the only labor required is that needed to read the gauges. The frequency of inspections for compliance with the work practice standards has also been reduced or revised. In the final rule, the frequency of inspections has been reduced from monthly or daily to once every 3 months. The EPA believes that the inspections are still necessary to ensure that system degradation is not occurring over time, because gradual degradation may not be apparent from compliance monitoring alone. Some commenters noted that their systems were not accessible for inspection, or that the inspection would result in extended downtime. The compliance timeframes in the final rule should allow sources sufficient time to retrofit their systems to facilitate inspections, and the negative effects of any downtime are minimized by the reduced inspection frequency.

The final rule also has been clarified so that monitoring requirements apply only during tank operation; tank operation is defined in § 63.341.

4. Compliance Monitoring Associated With Fume Suppressants

Regarding the use of wetting agenttype fume suppressants, seven commenters indicated that the requirement for maintaining surface tension below 40 dynes/cm for chromic acid baths is inappropriate. The reasons provided by the commenters were that a surface tension standard may not be prudent to demonstrate compliance, a direct correlation between exceedance of parameters and emission limits has not been established, and the rule should allow sources to set their own compliance value for surface tension. Other commenters noted that the specified limit was either too low or was not consistent with manufacturers' recommendations.

Based on data collected by the EPA, the performance of an electroplating bath controlled with a wetting agenttype fume suppressant can be determined by the surface tension of the bath. Therefore, the EPA believes that there is a direct link between surface tension and emissions. The EPA also believes that it is necessary and appropriate to set a default value for surface tension in the rule. Based on the EPA's experience, many decorative chromium electroplating tanks are not ventilated, making source testing impossible without considerable retrofitting.

The EPA has increased the default surface tension limit from the proposed 40 dynes/cm to 45 dynes/cm based on information received during the comment period. However, if a facility believes that a different surface tension value is appropriate, the rule allows a source to conduct a performance test concurrently with surface tension monitoring to establish the maximum surface tension that corresponds to compliance with the emission limits. The source would subsequently monitor surface tension, with an exceedance occurring if the surface tension of the bath exceeded the value measured during the performance test.

Regarding foam blanket-type fume suppressants, several commenters were concerned about the technique for measuring foam blanket thickness and the potential hazards associated with this measurement. Another commenter stated that the stack testing requirement is unreasonable due to its excessive cost.

The EPA does not believe that it is necessary to specify a procedure because it is simply a depth measurement. Specifying a technique may also hinder the development of site-specific techniques to reduce worker exposure. The EPA believes that wetting agents are safer than foam blankets because foam blankets present a potential safety hazard. The foam traps the hydrogen gas and chromic acid mist in the foam layer; if these gases build up and a spark is generated, a hydrogen explosion will result. As a means of encouraging wetting agent use over foam blankets, sources using wetting agents do not have to conduct a performance test unless they want to set a surface tension limit other than the

default value of 45 dynes/cm. The EPA believes that the compliance timeframes in the final rule will allow sources that currently use foam blankets the opportunity to explore the use of wetting agents. Sources that wish to continue using foam blankets will be required to conduct a performance test.

5. Frequency of Monitoring Associated With Fume Suppressants

There were over 20 comments related to the frequency of monitoring surface tension. Several of these commenters made recommendations for alternate monitoring schedules, ranging from daily to monthly monitoring, in place of the 4-hour schedule. Among the reasons cited for decreasing the surface tension monitoring frequency were that surface tension does not change on a daily or weekly basis, measuring surface tension is very time-consuming and could require someone full-time if there were multiple tanks, and frequent monitoring results in increased worker exposure.

Thirteen commenters provided remarks regarding the burden of hourly testing for sources using foam blankets. The commenters noted that foam blankets that are used according to manufacturer's instructions are designed to last 24 hours provided the air is not agitated at the surface near the anodes and freeboard height is adequate. Therefore, visual observation is adequate for determining foam blanket effectiveness. Other commenters stated that the excessive monitoring requirements for foam blankets discourage their use, yet several States recommend or require foam blankets with less testing and recordkeeping than that proposed by the EPA.

In response to comments and some data received, the EPA recognizes that the 4-hour surface tension monitoring frequency specified in the proposed rule may be burdensome, and in some cases, unnecessary. The EPA has insufficient data, however, to establish the monitoring frequency that is appropriate for each mode of bath operation. Therefore, the final rule allows a decrease in monitoring frequency if no exceedances occur. Section 63.343(c)(5)(ii)(B) specifies that the surface tension be measured once every 4-hours of tank operation for the first 40 hours of tank operation after the compliance date. If no exceedances occur, monitoring can occur once every 8 hours of tank operation. Once there are again no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an on-going basis, until an exceedance occurs. Once an exceedance of the