



February 6, 2008

COMPLIANCE ADVISORY

IMPLEMENTATION OF THE AMENDED AIRBORNE TOXIC CONTROL MEASURE (ATCM) TO REDUCE EMISSIONS OF CHROMIUM FROM CHROMIUM PLATING AND CHROMIC ACID ANODIZING FACILITIES

On December 7, 2006, after a public review process, the California Air Resources Board (CARB) adopted an airborne toxic control measure (ATCM), Section 93102 thru 93102.16, Title 17, California Code of Regulations, designed to reduce emissions of hexavalent chromium from chromium plating and chromic acid anodizing operations. The ATCM became effective on October 24, 2007.

The amended ATCM categorizes hexavalent chromium plating or chromic acid anodizing facilities as either existing, new, or modified with different requirements for each category. **Existing** facilities are those in operation before October 24, 2007. **New** facilities are those that began initial operations on or after October 24, 2007. **Modified** facilities are existing facilities that undergo certain physical changes in operation that result in increased hexavalent chromium emissions. In addition, there are separate requirements for enclosed hexavalent chromium electroplating operations and trivalent chromium plating baths.

A workshop was held by the San Diego County Air Pollution Control District (District) on Wednesday, November 14, 2007, to discuss local implementation of the ATCM.

A summary of regulation requirements follows:

- Existing facilities must comply with specified control levels for hexavalent chromium emissions, depending on the facility's annual permitted throughput (in ampere-hours) and distance to the nearest sensitive receptor such as a residence, school or hospital.
- Modified facilities must use add-on control devices to control hexavalent chromium emissions to no more than 0.0015 milligrams per ampere-hour (mg/amp-hr).
- New facilities must use a High Efficiency Particulate Arrestor (HEPA) add-on control device to control hexavalent chromium emissions to no more than 0.0011 mg/amp-hr.

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- New facilities must be located at least 1,000 feet away from the boundary of any area that is zoned for residential or mixed use, or any school or school under construction.
- Operations at any chrome plating or chromic acid anodizing operation must be conducted under the direction of someone who has completed the ARB Compliance Assistance Training Course pertaining to chromium plating and chromic acid anodizing.
- New housekeeping practices will be required to reduce potential fugitive emissions of hexavalent chromium.
- Some facilities, depending on their usage and proximity to a sensitive receptor, will be required to conduct a source test using approved test methods to demonstrate compliance with the applicable emission limits.
- Monitoring, inspection, maintenance, and recordkeeping will be required for all facilities.
- An initial and subsequent annual compliance reports will be required to be submitted to the District.

Under the California Health and Safety Code, the District is required to enforce State airborne toxic control measures. Facilities that operate a chromium electroplating or chromic acid anodizing operation **MUST submit an application to the District by February 24, 2008**, so their permits can be changed to reflect the ATCM requirements. For more information regarding the application submittal and fee, please contact Russell Yanagihara at (858) 586-2719.

Copies of the amended ATCM may be obtained from the District's website at <http://www.sdapcd.org> under Rules and Regulations, Public Workshop Schedule, or you can call Janet McCue at (858) 586-2712. Additional information can be obtained by going to the Air Resources Board (ARB) website at: <http://www.arb.ca.gov/toxics/chrome/chrome.htm>. Included with this advisory is the Air Resources Board (ARB) ATCM Fact Sheet that further discusses the scope of the ATCM.

If you have any questions regarding the ATCM, please contact Cara Bandera at (858) 586-2751 (by email at Cara.Bandera@sdcounty.ca.gov) or Gary Hartnett at (858) 586-2671 (by e-mail at Gary.Hartnett@sdcounty.ca.gov).