



## Air Pollution Control Board

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# COMPLIANCE ADVISORY

## IMPLEMENTATION OF THE NEW AIRBORNE TOXIC CONTROL MEASURE (ATCM) TO REDUCE EMISSIONS OF HEXAVALENT CHROMIUM AND NICKEL FROM THERMAL SPRAYING OPERATIONS

On December 9, 2004, the California Air Resources Board (CARB) adopted an airborne toxic control measure (ATCM) Section 93102.5, Title 17, California Code of Regulations designed to reduce emissions of hexavalent chromium and nickel from stationary thermal spraying operations. The ATCM became effective on September 30, 2005.

The ATCM has different emission requirements depending on whether the hexavalent chromium or nickel thermal spraying operation is considered existing, new, or modified. **Existing** thermal spraying facilities are those that were in operation before January 1, 2005. **New** thermal spraying facilities are those that began initial operations on or after January 1, 2005. **Modified** thermal spraying operations are existing thermal spraying facilities that undergo certain physical changes in operation after January 1, 2005. In addition, new thermal spraying operations at existing facilities that have already been permitted to spray chromium or nickel are considered modified operations.

The ATCM also contains monitoring, inspection, maintenance, recordkeeping, and reporting requirements for thermal spraying operations. It does not apply to portable thermal spraying operations. A workshop was held by the San Diego County Air Pollution Control District (District) on Wednesday, January 25, 2006, to discuss implementation of the ATCM.

A summary of regulation requirements follows:

- Requires emissions be routed through an air pollution control system that meets specified ventilation and enclosure standards. Facilities are required to conduct an inward face velocity test in accordance with Appendix 2 of the ATCM, and a visual leak inspection in accordance with Appendix 3 of the ATCM. Facilities are required to notify the District at least 30 days prior to conducting the inward face velocity test. This test can be performed by site personnel and does not require the use of an independent tester.

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- Requires existing thermal spraying operations to comply with specified control efficiency standards by January 1, 2006. The control efficiency standards are dependent on current controlled emissions of chromium and nickel.
- Requires modified and new thermal spraying operations to use a control device certified by the manufacturer to achieve 99.97% control efficiency for particulates that are 0.3 micron in diameter.
- Requires new thermal spraying facilities be located at least 500 feet away from an area that is zoned residential or mixed use.
- Exempts remotely located and low emitting thermal spraying operations from the control efficiency, ventilation, and enclosure standards.
- Specifies that emissions be determined in accordance with specified emission calculation methods in the regulation or based on site-specific source test data.
- Specifies test methods to determine compliance with the control efficiency, ventilation, and enclosure standards and to determine emissions of hexavalent chromium and nickel. In addition, the regulation requires source tests be conducted by an independent tester.
- Requires a baseline emission inventory for hexavalent chromium and nickel be submitted to the District. A recent toxic emission inventory report will meet this requirement. If you do not have a recent toxic emission inventory report, the District will request one.

Under the California Health and Safety Code, the District is required to enforce State airborne toxic control measures. Facilities that spray hexavalent chromium or nickel containing compounds **MUST submit an application to the District by May 22, 2006**, so their permits can be changed to reflect the ATCM requirements. For more information regarding the application submittal and fee, please call Dave Byrnes at (858) 586-2736.

Included with this advisory are the CARB Thermal Spraying ATCM Advisory and Fact Sheet that further discusses the scope of the ATCM. Copies of the ATCM, the CARB ATCM Advisory, and the Fact Sheet may be obtained from the CARB website at <http://www.arb.ca.gov/coatings/thermal/thermal.htm>; or you can call Luann Serbesku at (858) 586-2755. If you have any questions regarding the ATCM, please contact Cara Bandera at (858) 586-2751 or by email at [Cara.Bandera@sdcounty.ca.gov](mailto:Cara.Bandera@sdcounty.ca.gov).