AIR POLLUTION CONTROL DISTRICT
SAN DIEGO COUNTY

PROPOSED REPEAL OF RULE 1201 HEXAVALENT CHROMIUM - CHROME PLATING AND CHROMIC ACID ANODIZING AND IMPLEMENTATION OF THE AIRBORNE TOXIC CONTROL MEASURE

WORKSHOP REPORT

A workshop notice was mailed to all businesses and government entities in San Diego County that are involved in chrome plating and anodizing operations. In addition, notices were mailed to all local Chambers of Commerce, all local Economic Development Corporations, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on May 4, 1999, and was attended by two people. The workshop comments and District responses are as follows:

1. WORKSHOP COMMENT

Many facility operators add fume suppressants to the electroplating or anodizing bath to comply with standards of the State Airborne Toxic Control Measure (ATCM). Specifically, the facility operator is required to maintain records of the date, time, approximate volume, and product identification of the fume suppressants that are added. What is the reason for recording the time of fume suppressant addition?

DISTRICT RESPONSE

As discussed, the modifications to this ATCM result from the integration of the California air toxic control program with new requirements of the federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) developed by U.S. EPA. The need to record the time fume suppressant is added is a specific requirement of the federal EPA. Adherence to recordkeeping will also serve as a tool to track compliance.

2. WORKSHOP COMMENT

If a facility has submitted the required Initial Compliance Status Report to the District, is it necessary to resubmit this report?

DISTRICT RESPONSE

The Initial Compliance Status Report must only be submitted once. Those facilities that already submitted this report to the District do not need to resubmit it unless there are significant changes to the operation. In such cases, the District requires a new (or modified) Compliance Status Report.

3. WORKSHOP COMMENT

There are several emission standards listed in the ATCM depending on facility size. These standards are more stringent for facilities with greater potential to emit. How does the District determine the applicable standard for a source that will be modified and possibly increase its emissions of hexavalent chromium?

DISTRICT RESPONSE

In order to determine the applicable standard for a modified source, the District will review historic facility emissions and equipment capacity. In addition, the facility owner will be consulted to project or confirm intended usage of hexavalent chromium containing compounds. From that, the District will determine the applicable standard and the most suitable means to ensure compliance. The standard and compliance assurance methods will be documented in permit conditions limiting the equipment operations or capacity.

5/25/99
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