

Proposed Administrative Change for Thermal Spraying Operations

On November 16-17, 2006, the California Air Resources Board (ARB or Board) will consider regulatory revisions that will clarify that certain types of “Thermal Spraying” are considered a metal coating activity covered by the AB 2588 Air Toxics “Hot Spots” Program. This revision would only apply to thermal spraying operations that use materials containing chromium or nickel. We anticipate that in most cases compliance with the “Airborne Toxic Control Measure to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying” (ATCM) adopted by the Board in 2004 will satisfy the requirements of the “Hot Spots” Program.

California’s AB 2588 Air Toxics “Hot Spots” Program helps identify facilities that emit toxic air contaminants and pose a public health risk. After high-risk facilities are identified, they must take actions to reduce their risk to acceptable levels. Thermal spraying operations in California are not expected to be found to be “high-risk” after complying with the ATCM. In addition, the ATCM already requires submittal of a baseline emission inventory, which satisfies AB 2588 reporting requirements. Therefore, it is not expected that thermal spraying operations would be subject to additional requirements as a result of the proposed changes to the AB 2588 Program.

The reason for adding new language related to thermal spraying operations to the “Hot Spots” Program is to ensure statewide consistency with regard to thermal spraying operations and the “Hot Spots” Program. Previously local air districts had varying ways of addressing thermal spraying operations.

While the ARB sets applicability and reporting requirements for the “Hot Spots” Program, districts have responsibility for the local implementation of the “Hot Spots” Program. Your local district will notify you if your thermal spraying operations trigger any additional requirements, or if you may be subject to any local “Hot Spots” fees.

For additional information on the proposed changes to AB 2588, please refer to the following websites:

<http://www.arb.ca.gov/ab2588/whatsnew.htm>
<http://www.arb.ca.gov/regact/hotspot06/hotspot06.htm>

For information on the Thermal Spraying ATCM, please contact: Ms. Monique Davis at (916) 324-8182 or mdavis@arb.ca.gov.