



Chrome Plating ATCM Amendments

Technical Working Group #7

4/26/2022

Meeting Agenda

- Draft rule language
- Timeline
- Questions

Working Group 6 Summary

- Presented draft concepts
- Asked for comments on
 - Environmental Assessment Notice of Preparation
 - Preliminary Cost Document

Comment Summary

- Comments received:
 - Timeline is too short for decorative transition. Unable to meet 2-year time frame
 - 15 years is not long enough for functional transition due to current technology and lifespan of equipment being plated
 - Amendments should take on a Rule 1469 plus style rule
 - Actions should be taken only after technology reviews are complete and not before

Comment Summary (cont.)

- Comments continued:
 - Quantification of actual emissions should be based on source tests rather than a sources potential to emit
 - Value added to economy goes beyond plated parts worth and should consider the cost of making new replacement parts
 - What is the cost vs risk especially in cases where facilities are located further away from receptors

Draft Rule Language Summary

New and Modified Facilities

- Restriction on new hexavalent chromium plating and chromic acid anodizing facilities
 - No new facilities after January 1, 2024.
 - Section 93102.4(a)
- Modification of existing facilities (until phase out dates)
 - Facilities can be modified after January 1, 2024 as long as permitted amp-hr/year are not increased and
 - Any additional tanks meet Tier I, Tier II, or Tier III standards as applicable (same Tier standards as SCAQMD)
 - Section 93102.4(b)(1)

Hexavalent Chromium Phase-out

- Decorative plating phase out hexavalent chromium by January 1, 2026
 - 1-year extension if needed to deal with delays in the transition
 - Section 93102.4(b)(2)
- Hard plating and chromic acid anodizing phase out by January 1, 2039
 - Two technology reviews in the interim
 - Section 93102.4(b)(3) – 93102.4(b)(5)

Technology Reviews

- Two technology reviews to assess feasibility of transition by January 1, 2039
 - Plan to be developed by 2029
 - First technology review completed by January 1, 2032
 - Second technology review completed by January 1, 2036
- Will be used to determine the need to amend the phase out date
- Appendix 11

New Emission Limit

- ATCM limits decreased to 0.00075 mg/amp-hr
 - For hard plating and chromic acid anodizing facilities operating after January 1, 2026
 - Most existing facilities should be able to meet this emission limit with existing control equipment
 - Upgrade control equipment or facility operations if needed to meet this emission limit
 - Section 93102.4(b)(6)

Trivalent Chromium Facilities

- No changes to the way trivalent chromium facilities operate
- Section 93102.6

Source Testing

- All hard plating and chromic acid anodizing facilities that will continue operating past January 1, 2026, must perform source test before January 1, 2026
- On-going source testing every 2 years
- Section 93102.7

Additional Rule Requirements

- Draft regulation language incorporates rule 1469 requirements including;
 - Building enclosures – 93102.4(d) & (e)
 - Tier Tank controls – 93102.4(g) & (h)
 - Enhanced Housekeeping Requirements 93102.5(a)
 - Best Management Practices 93102.5(b)

Next Steps

- Economic assessment released publicly – June 2022
- Public Workshop – June 2022
- Formal rule making documents released for public comment – September 2022
- 1st Board hearing – October 2022
- 2nd Board hearing – April 2023
- Anticipated effective date – Jan 1, 2024

Questions + Comments

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