

Proposed Amendments to the Metal Plating ATCM

SCAQMD Staff Comments
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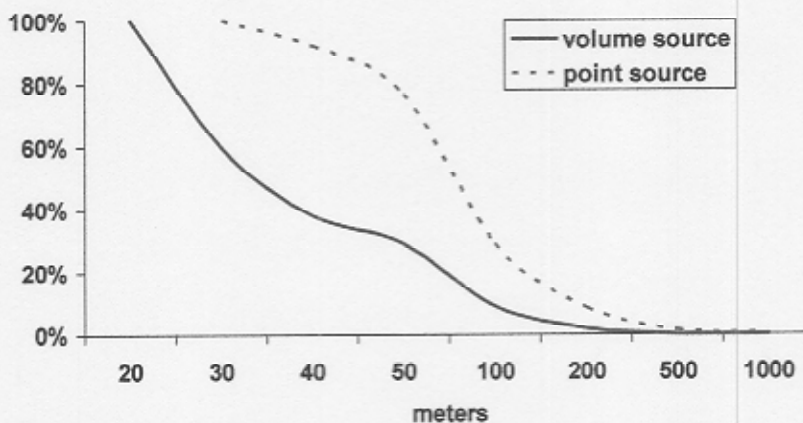
Background

- Based on experience with metal platers, improvements can be made to both Rule 1469 and the proposed ATCM
- Offering a package of suggested amendments that will provide better public health protection and a stronger ATCM

Key Policy Issue: Fume Suppressants or HEPA?

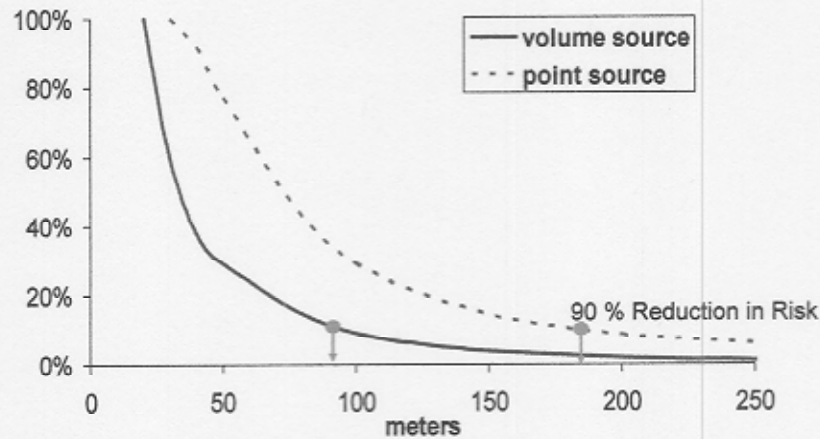
- Both approaches very effective
 - Fume suppressants 99.5%, pollution prevention technique, volume source
 - HEPA 99.97%, point source
- Either technology needs consistent operation and trained personnel
 - HEPA highly dependant on collection efficiency

Percentage of Cancer Risk vs. Distance from Chrome Plating Facility



* Pasadena meteorological data set and small facility.

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Suggestions to Improve ATCM

- Technology neutral – source test to demonstrate emission levels met
- Allow option of 0.0011mg/amp-hr or AB2588 for facilities >15 grams/yr
- Increase buffer zone for new facilities to 300 meters and add schools to zone restrictions

Suggestions, continued

- Shorter compliance timelines
- Use fume suppressants before controls installed
- Add backstop – 3 emission related violations in 5 years, meet most stringent emission limit
- Increased inspections, source tests, recordkeeping and training

Summary and Recommendations

- Taken as a whole, suggested revisions to ATCM will make the ATCM much stronger and provide better public health protection
- Request that the entire package of changes be a 15-day change or 30-day delay if necessary