



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

LOCAL GOVERNMENT & SMALL BUSINESS ASSISTANCE ADVISORY GROUP MEETING

Advisory Group Members

Mayor Pro Tempore Ben Benoit, LGSBA Chairman (Board Member)
Supervisor Janice Rutherford (Board Member)
Felipe Aguirre
Mayor Rachelle Arizmendi, City of Sierra Madre
Paul Avila, P.B.A. & Associates
Geoffrey Blake, Metal Finishers of Southern California
Todd Campbell, Clean Energy
LaVaughn Daniel, DancoEN
John DeWitt, JE DeWitt, Inc.
Bill LaMarr, California Small Business Alliance
Rita Loof, RadTech International
Eddie Marquez, Roofing Contractors Association
David Rothbart, Los Angeles County Sanitation Districts

Friday, March 12, 2021 ♦ 11:30 a.m.

Pursuant to Governor Newsom's Executive Orders N-25-20 (March 12, 2020) and N-29-20 (March 17, 2020), the South Coast AQMD Local Government & Small Business Advisory Group meeting will only be conducted via video conferencing and by telephone. Please follow the instructions below to join the meeting remotely.

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION AT BOTTOM OF AGENDA

Join Zoom Webinar Meeting – from PC or Laptop
<https://scaqmd.zoom.us/j/92459924491>

Zoom Webinar ID: 924 5992 4491 (applies to all)

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Audience will be allowed to provide public comment through telephone or Zoom connection during public comment period.

PUBLIC COMMENT WILL STILL BE TAKEN

AGENDA

Members of the public may address this body concerning any agenda item before or during consideration of that item (Gov't. Code Section 54954.3(a)). All agendas for regular meetings are posted at South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, at least 72 hours in advance of the regular meeting. Speakers may be limited to three (3) minutes each.

CALL TO ORDER

ACTION ITEMS (Items 1 through 3):

1. Call to Order/Opening Remarks
(No Motion Required)
Mayor Pro Tem. Ben Benoit
Committee Chair
2. Approval of February 12, 2021 Meeting Minutes
(Motion Required)
[Attachment 1]
Mayor Pro Tem. Ben Benoit
Committee Chair
3. Review of Follow-Up/Action Items
(No Motion Required)
Staff will review the follow-up/action items identified in the previous meeting.
Derrick J. Alatorre
Deputy Executive Officer
Legislative, Public Affairs & Media

DISCUSSION ITEMS (Items 4 through 5):

4. Update on Best Available Control Technology Guidelines (BACT)
Staff will provide information on the latest updates to the BACT Guidelines approved by the Governing Board on February 2021.
(No Motion Required)
[Attachment 2]
Al Baez
Program Supervisor
Science & Technology
Advancement
5. Overview of Adopted Rule 1407.1: Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations
Staff will provide an overview on recently adopted Rule 1407.1, which applies to chromium metal melting operations.
(No Motion Required)
[Attachment 3]
Uyen-Uyen Vo
Program Supervisor
Planning, Rule Development & Area Sources

WRITTEN REPORT:

6. Monthly Report on Small Business Assistance Activities *All*
Summary of assistance and outreach activities conducted by South Coast AQMD's Small Business Assistance Office for February 2021.
(No Motion Required)
[Attachment 4]

OTHER MATTERS:

7. Other Business
Any member of this body, or its staff, on his or her own initiative or in response to questions posed by the public, may ask a question for clarification, may make a brief announcement or report on his or her own activities, provide a reference to staff regarding factual information, request staff to report back at a subsequent meeting concerning any matter, or may take action to direct staff to place a matter of business on a future agenda. (Gov't. Code Section 54954.2)
8. Public Comment Period
At the end of the regular meeting agenda, an opportunity is provided for the public to speak on any subject within the Local Government and Small Business Assistance Committee's authority that is not on the agenda. Speakers may be limited to three (3) minutes each.
9. **Next Meeting Date** - Friday, April 9, 2021 at 11:30 a.m.

ADJOURNMENT

Document Availability

All documents (i) constituting non-exempt public records, (ii) relating to an item on an agenda for a regular meeting, and (iii) having been distributed to at least a majority of the Committee after the agenda is posted, are available by contacting Van Doan at (909) 396-3117 or send the request to kdoan@aqmd.gov.

Americans with Disabilities Act and Language Accessibility

Disability and language-related accommodations can be requested to allow participation in the Local Government and Small Business Assistance Advisory Group meeting. The agenda will be made available, upon request, in appropriate alternative formats to assist persons with a disability (Gov't Code Section 54954.2(a)). In addition, other documents may be requested in alternative formats and languages. Any disability or language-related accommodation must be requested as soon as practicable. Requests will be accommodated unless providing the accommodation would result in a fundamental alteration or undue burden to the South Coast AQMD. Please contact Van Doan at (909) 396-3117 from 7:00 a.m. to 5:30 p.m., Tuesday through Friday, or send the request to kdoan@aqmd.gov.

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION

Instructions for Participating in a Virtual Meeting as an Attendee

As an attendee, you will have the opportunity to virtually raise your hand and provide public comment.

Before joining the call, please silence your other communication devices such as your cell or desk phone. This will prevent any feedback or interruptions during the meeting.

Please note: During the meeting, all participants will be placed on Mute by the host. You will not be able to mute or unmute your lines manually.

After each agenda item, the Chair will announce public comment.

A countdown timer will be displayed on the screen for each public comment. If interpretation is needed, more time will be allotted.

Once you raise your hand to provide public comment, your name will be added to the speaker list. Your name will be called when it is your turn to comment. The host will then unmute your line.

Directions for Video ZOOM on a DESKTOP/LAPTOP:

- If you would like to make a public comment, please click on the “**Participants**” button on the bottom of the screen.
- A list of participants will appear on the right side of the screen. At the bottom of the list, please click on the grey “**Raise Hand**” button.
- This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions for Video Zoom on a SMARTPHONE:

- If you would like to make a public comment, please click on the “**Participants**” button on the bottom of your screen.
- A new screen will pop up with the list of participants. Look for the “**Raise Hand**” button on the screen and click the button.
- This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions for TELEPHONE line only:

- If you would like to make public comment, please **dial *9** on your keypad to signal that you would like to comment



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DRAFT

LOCAL GOVERNMENT & SMALL BUSINESS ASSISTANCE ADVISORY GROUP FRIDAY, FEBRUARY 12, 2021 MEETING MINUTES

MEMBERS PRESENT:

Mayor Pro Tempore Ben Benoit, LGSBA Chairman (Board Member)
Supervisor Janice Rutherford (Board Member)
Felipe Aguirre
Mayor Rachelle Arizmendi, City of Sierra Madre
Paul Avila, P.B.A. & Associates
Geoffrey Blake, Metal Finishers of Southern California
Todd Campbell, Clean Energy
Bill LaMarr, California Small Business Alliance
Rita Loof, RadTech International
Eddie Marquez, Roofing Contractors Association
David Rothbart, Los Angeles County Sanitation Districts

MEMBERS ABSENT:

LaVaughn Daniel, DancoEN
John DeWitt, JE DeWitt, Inc.

OTHERS PRESENT:

Mark Abramowitz
Harvey Eder, Public Solar Power Coalition
Frank Forbes
Thomas Gross, Board Member Consultant (*Benoit*)
Debra Mendelsohn, Board Member Consultant (*Rutherford*)
Dan McGivney, SoCal Gas
Mark Taylor, Board Member Consultant (*Rutherford*)

SOUTH COAST AQMD STAFF:

Jill Whynot, Chief Operating Officer
Derrick Alatorre, Deputy Executive Officer
Anissa Heard-Johnson, Deputy Executive Officer
Sarah Rees, Deputy Executive Officer
Victor Yip, Assistant Deputy Executive Officer
Daphne Hsu, Senior Deputy District Counsel
Mark Henninger, Information Technology Manager
Zorik Pirveysian, Planning & Rules Manager
Hugh Heney, Air Quality Analysis & Compliance Supervisor
Brian Roche, Systems & Programming Supervisor
Anthony Tang, Information Technology Supervisor

Van Doan, Air Quality Specialist
Elaine-Joy Hills, Air Quality Specialist
Paul Wright, Senior Information Technology Specialist

Agenda Item #1 - Call to Order/Opening Remarks

Supervisor Janice Rutherford called the meeting to order at 11:30 a.m.

Agenda Item #2 – Approval of January 15, 2021 Meeting Minutes/Review of Follow-Up/Action Items

Supervisor Rutherford called for approval of the January 15, 2021 meeting minutes. The minutes were approved unanimously.

Agenda Item #3 – Review of Follow Up/Action Items

Mr. Alatorre provided a response to the action items from the previous meeting and indicated that these items will be addressed during today's Air Quality Management Plan (AQMP) presentation.

Agenda Item #4 – Update on recent Air Quality Management Plan (AQMP) Related Activities

Mr. Zorik Pirveysian provided an update of the South Coast Air Basin Attainment Plan for the 2006 24-hour Particulate Matter_{2.5} (PM_{2.5}) Standard, the Coachella Valley Extreme Area Plan for the 1997 8-hour Ozone Standard, and the 2022 AQMP development.

Mr. David Rothbart indicated that the 2016 AQMP described incentive funding needed to achieve emissions reductions. He stated that federal sources are unlikely to be clean enough to get to attainment and expressed concern about the unintended consequences of Section 185 of the Clean Air Act (CAA) that would be placed on major stationary sources for non-attainment. Mr. Rothbart indicated that Rule 317 – Clean Air Act Non-Attainment Fees might not be able to offset future penalties and would like to know how it would be possible to maintain the ability to avoid those consequences. Additionally, the California Air Resources Board (CARB) has a focus on electrification of all sources; however, it might not occur quickly enough for attainment. It appears that CARB is not looking at transition fuels and technology for immediate emissions reductions and would like to find ways to continue discussions with CARB to foster transition fuels and achieve reductions as soon as possible. Mr. Pirveysian stated that the 2016 AQMP specified a reduction of 108 tons/day of nitrogen oxide (NO_x) by 2023, which is a challenge and needs regulations or programs to achieve it. Subsequently, there was a Contingency Measures Plan (CMP) to address the 108 tons/day NO_x reduction. The CMP specified requirements for South Coast Air Quality Management District (South Coast AQMD), CARB, and the Environmental Protection Agency (EPA). Approximately 60-70 tons/day were identified to be from federal sources, such as ocean-going vessels, aircrafts, and trucks, to achieve that level of reductions. Without those emissions reductions, it would be impossible to demonstrate attainment. There is a fee equivalency provision in Rule 317 allowing offset so that the major sources don't have to pay the fee. There must be a reductions surplus to demonstrate equivalency on money spent on projects that would offset fees that major sources have to pay. In terms of near-term reductions as part of the mobile source strategies, CARB is in the process of updating the mobile source strategy and will have additional short-term reductions, such as maintenance or other programs. Dr. Sarah Rees indicated that South Coast AQMD continues to raise this issue with EPA and there are ongoing discussions. As for CARB, there is a change in leadership and we will continue to have discussions on the need to get to near-zero and on how to achieve immediate reductions. Mr. Rothbart commented on the focus on electrification and offered assistance, if needed.

Mr. Bill LaMarr expressed support for Mr. Rothbart's comments and recommended to communicate with the new administration and EPA to address sources in their jurisdiction so that businesses are not affected by Section 185. Mr. Alatorre indicated there is an ongoing effort to alert Congress of upcoming mandates and ask for assistance when needed, such as incentive funding or authority. Mr. LaMarr stated that it's only been one month since the inauguration and that previous visits were prior to that and asked

what could be done now. Mr. Alatorre replied that there is ongoing communication and the earliest return to Washington D.C. would be later this year. Chair Benoit asked to check if congressional members and the administration representatives are open to other types of meetings and suggested having virtual meetings with them, if possible. Mr. Alatorre stated that there are meetings with the members from our delegation and will work on meetings with the administration representatives. Dr. Rees indicated that the administration is in the transition period and does not have an assigned administrator yet and suggested waiting for assignment of a permanent representative. Mr. LaMarr commented that it is the time to plan. Mr. Alatorre replied that we have been prepared for 10 years and continue to do so. He also mentioned that Senator Padilla is from our region and is aware of the issues and we will have a strong voice on the Senate Committee on Environment and Public Works (EPW), which EPA reports to. We will utilize every tool we have to ensure that the administration and legislative bodies hear from us.

Ms. Rita Loof referenced slide #10 and indicated that RadTech previously provided comment on the Reasonable Available Control Technology (RACT) and that South Coast AQMD relied on outdated documents from EPA. Ms. Loof hopes the science behind these documents is updated. Mr. Pirveysian stated that a letter was submitted to EPA requesting to update the guidelines. When considering a RACT and Best Available Control Technology (BACT) analysis, the latest regulations adopted by other agencies in California or the United States (US) are reviewed to provide a benchmark of the latest technologies that other agencies have considered.

Mr. Todd Campbell commented that proposed Rule 2305 – Warehouse Indirect Source Rule would be more effective if there is more flexibility, particularly to include near-zero yard tractors. The Port of Los Angeles has 4-5 BYD Motors tractors, which don't work. If these yard tractors don't work and near-zero tractors have no point values, the ports might turn to diesel-fueled equipment.

Mr. Harvey Eder provided comment on solar power.

Agenda Item #5 – Compliance & Enforcement (C&E) Programs

Mr. Hugh Heney provided information on Compliance & Enforcement (C&E) programs, including information on inspections and enforcement actions. Mr. Brian Roche provided an overview of the Facility Information Detail (FIND) online tool.

Mr. Rothbart indicated that having routine dialog with the regulated community is very helpful and suggested having additional training courses available, possibly coordinated by a permit streamlining and permitting committee. Mr. Heney indicated that management is available to discuss training options.

Ms. Loof referenced slide #7 and asked if the training program provides small businesses with resources and information to prevent violations. If not, Ms. Loof requested for consideration. Mr. Heney stated that in the past, staff would host events at various locations within South Coast AQMD and provided assistance to small businesses. Ms. Jill Whynot indicated that there are programs for small business assistance, training courses, and website updates. There are limited resources, but South Coast AQMD strives for, continues to improve and will consider the suggested ideas. Ms. Loof suggested having links available on the website for businesses as they are reluctant to reach out to inspectors for assistance and having access to other community contacts and resources.

Mr. LaMarr referenced revenue data presented at an earlier meeting and slide #6 on air quality complaints and asked if the revenue from penalties decreased due to less inspections or high compliance

rate. Ms. Whynot replied that inspectors continue to conduct inspections, modified to meet safety requirements. As for penalties, it is difficult to determine what it is driven by as there is a large number of small penalties, but 95% of the total amount could be from 3-4 large penalties. Staff is always striving to help improve compliance rates, which is generally high. Mr. LaMarr agreed that there is a high compliance rate. Mr. LaMarr asked how long a Notice of Violation (NOV) or Notice to Comply (NC) is available on the FIND program. Mr. Roche replied that they will remain on FIND indefinitely. Mr. LaMarr referenced slide #3 and asked if a mobile fuel truck would be classified as a facility. Ms. Whynot replied that a mobile fuel truck does not meet the traditional definition of a facility, but may be subject to permitting requirements. South Coast AQMD has the authority to regulate sources even when permits are not required, such as sources subject to Rule 1113 – Architectural Coatings.

Mr. Geoffrey Blake indicated that there was an ombudsman in the past and asked if there will be one in the future. Mr. Alatorre replied that he is the Public Advisor, who is the point of contact for the public and businesses.

Agenda Item #6 – Monthly Report on Small Business Assistance Activities

No comments.

Agenda Item #7 - Other Business

None.

Agenda Item #8- Public Comment

Mr. Eder provided additional comments on solar power.

Agenda Item #9 – Next Meeting Date

The next regular Local Government & Small Business Assistance Advisory Group meeting is scheduled for Friday, March 12, 2021 at 11:30 a.m.

Adjournment

The meeting adjourned at 1:01 p.m.

UPDATES TO BEST AVAILABLE CONTROL TECHNOLOGY GUIDELINES

Local Government & Small Business Assistance
Meeting
March 12, 2021

1

Last Update to BACT Guidelines 2/1/19



- Update to Overview, Parts A, B, C, and D
- Maintained consistency with recent changes to South Coast AQMD rules, State and Federal requirements
- BACT webpage (interactive and user friendly)
- Referenced Engineering & Permitting policy preventing circumvention of BACT requirement for emission increase



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LGSBA Meeting - March 2021

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2/5/21 Amendments to BACT Guidelines

- Administrative changes to Table of Contents, Overview, Parts A, C, D, and E
- Part B, Major Polluting Facilities (LAER/BACT) – Section I
 - New & updated listings
- Part C, Policy and Procedures: Non-major Polluting Facilities
 - Update maximum cost effectiveness criteria
- Part D, Non-Major Polluting Facilities (BACT)
 - New & updated listings and clarifications/updates to existing listings

BACT Guidelines Update Process



3

LGSBA Meeting - March 2021

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Part B- LAER/BACT Determination Section I: New Listings



- **Regenerative Thermal Oxidizer (RTO), Natural Gas Fired**
 - Low NOx burner, 9.8 MMBTU/hr, venting prime and finish coating stations
 - 30 ppmv NOx and 100 ppmv CO limits (3% O₂), burner operation only
- **Recuperative Thermal Oxidizer, Natural Gas Fired**
 - Low NOx burner, 9.8 MMBTU/hr, venting adhesive coater ovens
 - 30 ppmv NOx and 250 ppmv CO limits (3% O₂), non-process emissions
- **Flare (Thermal Oxidizer) - Liquid Transfer and Handling Marine Loading**
 - Low NOx burner, venting terminal tank farm
 - 30 ppmv NOx and 10 ppmv CO limits (3% O₂), non-process emissions

Comment	Response
Concerned about terminal VOC emissions	Permit condition limits VOC emissions regardless of the product loaded

4

LGSBA Meeting - March 2021

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Part B- LAER/BACT Determination

Section I: New Listings



- **Process Heater – Non-Refinery, Thermal Fluid Heater, Natural Gas Fired**
 - Low NOx burner, 4.5 MMBTU/hr
 - 9 ppmv NOx and 100 ppmv CO limits (3% O₂)
- **I.C. Engine, Stationary, 147 & 385 BHP, Non-Emergency, Electrical Generation with NSCR, Natural Gas Fired**
 - Prime engines generating electrical power to remote sites
 - 0.07 lb/MW-hr (2.5 ppmv) NOx, 0.10 lb/MW-hr (10 ppmv) VOC and 0.20 lb/MW-hr (12 ppmv) CO limit (15% O₂)

Comment	Response
Revise equipment information and control technology on LAER Determination Form	Modified and clarified equipment function and control technology

5

LGSBA Meeting - March 2021

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Part B- LAER/BACT Determination

Section I: New Listing



- **Duct Burner – Refinery Fuel Gas**
 - The Heat Recovery Steam Generator (HRSG) is designed with a duct burner for extra steam generation as part of a cogeneration unit
 - The cogen includes a Combustion Gas Turbine (CGT), HRSG and Back-Pressure Steam Turbine
 - Total Reduced Sulfur limit: 40 ppm, rolling 1-hr & 30 ppm, rolling 24-hr avg. period

Comment	Response
Clarify what is being established as LAER and how compliance is shown	Determination is for SOx emissions and compliance showed by maintaining the CPMS to monitor the TRS calculated as H ₂ S in fuel gas

6

LGSBA Meeting - March 2021

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Part B- LAER/BACT Determination

Section I: New Listing



- **Aluminum Heat Treating Oven; 5.47 MM Btu/hr, Billet Temp. < 970°F**
 - Low NOx burner, 5.47 MMBTU/hr, oven treats aluminum billets prior to and during extrusion process
 - 25 ppmv NOx limit (3% O₂)

Section I: Listing Update



- **Gas Turbine – Simple Cycle, Natural Gas**
 - Peaker Units: provide electricity during periods of high electricity demand
 - Update NOx limit from 2.5 to 2.3 ppmv and CO limit from 6 to 4 ppmv
 - NH₃ slip limit: 5 ppmv (15% O₂)

Comment	Response
Additional information on test results	Added three most recent RATA results

7

LGSBA Meeting - March 2021

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Part D- BACT Determination

New Listings



- **Fermentation, Wine Tanks Closed-Top ≤ 30,000 Gal.**
 - Water Scrubber or Chiller Condenser with 67% overall control eff. averaged over length of fermentation season to control VOC emissions
 - Cost-Effectiveness Evaluation
- **Regenerative Thermal Oxidizer, Natural Gas Fired**
 - Low NOx burner, 16 MMBTU/hr, venting all aspects of the electric and acoustic guitars spray/hand coating operations
 - 30 ppmv NOx and 400 ppmv CO limits (3% O₂), burner operation only
 - Cost-Effectiveness Evaluation



8

LGSBA Meeting - March 2021

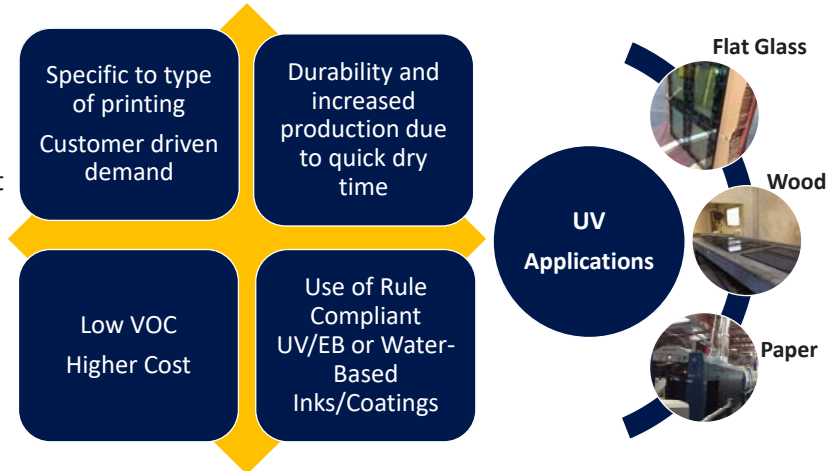
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Part D- BACT Determination

Alternate BACT Option UV/EB Technology



- Stationary Source Committee (SSC) directed staff to look into the availability of UV/EB technology for categories listed in RadTech's comment letter in addition to cost data for potential BACT.
- Staff conducted site visits to facilities listed in the comment letter and other printing facilities using UV inks/coatings.



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LGSBA Meeting - March 2021

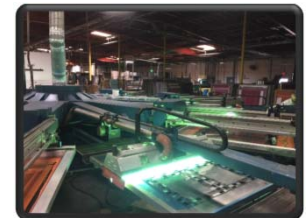
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Part D- BACT Determination

New Listings



- **Glass Screen Printing – Flat Glass**
 - Compliance with Rule 1145 or use of Rule 1145 compliant UV/EB or Water-Based Coatings
 - Source Test/SDS showing VOC emission limits compliance
- **Spray Booth – Wood Cabinets (Encl. with automated spray nozzles)**
 - For Wood Cabinets < 1170 lbs VOC/month
 - Compliance with Rule 1136 or use of Rule 1136 compliant UV/EB or Water-Based Coatings
 - Source Test/SDS showing VOC emission limits compliance



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LGSBA Meeting - March 2021

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Part D- BACT Determination

Updates for Consistency with Rules & Regulations



Flare
Produced Gas, Landfill
Gas, Organic Liq. Handling
& Other Flare Gas

Compliance with Rule
1118.1 for NO_x, CO
and VOC

Fish Reduction
Cooker, Dryer,
Digester, Evaporator
and Acidulation Tank

Rule 1147 does not
apply
Remove NO_x
requirement

Coffee Roasting
Food Oven/Roaster

Rule 1147 does not
apply
Remove NO_x
requirement

11

LGSBA Meeting - March 2021

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Part D- Clarifications



- **Gas Turbine:** Clarified add-on controls for ammonia slip limit
- **I.C. Engines:** Updated determination revision date
- **Open Process Tanks:** Merged "Chemical Milling Tanks" and "Chrome plating" categories and clarified Rule 1469 compliance
- **Polyester Resin Operations:** Merged similar resin operations categories
- **Powder Coating Booth:** Corrected throughput limit to be consistent with internal policy and clarified PM control options
- **Printing (Graphic Arts):** Updated compliance with thermal oxidizer BACT requirements for "Flexographic and Lithographic or Offset, Heatset" categories
- **Spray Booth:** Updated description and rule applicability
- **Thermal Oxidizer:** Clarified title for types of oxidizers and added "Regenerative Thermal Oxidizer" subcategory

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LGSBA Meeting - March 2021

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Next Steps



- Latest updates available on BACT webpage www.aqmd.gov/home/permits/bact/guidelines
- BACT Guidelines is a continually evolving document
- Began preliminary process for next amendments/updates to BACT Guidelines

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LGSBA Meeting - March 2021

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QUESTIONS



Thank You.

- Al Baez
- 909 396 2516
- abaez@aqmd.gov
- Bahareh Farahani
- 909 396 2353
- bfarahani@aqmd.gov



14

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Rule 1407.1 Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations

LGSBA Advisory Group
March 12, 2021

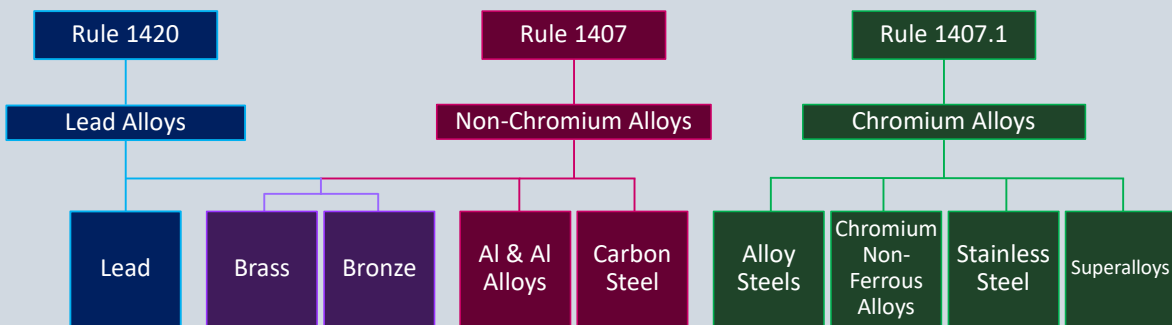


1

South Coast AQMD Metal Melting Rules

Prior to adoption of Rule 1407.1, there was no source-specific rule to address emissions from melting of chromium alloys

- During metal melting, chromium alloys have the potential to emitted toxic air contaminants, including hexavalent chromium



2

2

Rule 1407.1 Regulatory History

November 2015 – Proposed Amended Rule (PAR) 1407 Rule Development

- Initiated rule development to expand the applicability to address chromium and non-chromium metal melting operations
- After several working groups, bifurcated rule making at the request of stakeholders
 - PAR 1407 – Address non-chromium metal melting
 - PR 1407.1 – Address chromium metal melting
 - Additional emissions data needed for chromium metal melting operations

December 2018 – Conducted Source Testing Assessment

- Board directed staff to work with the California Metals Coalition to collect necessary emissions data
- California Metals Coalition identified three facilities that would volunteer to conduct source testing

February 2020 – Re-Initiated PR 1407.1 Rulemaking

- Source testing completed and re-initiated rulemaking

January 2021 – Rule 1407.1 Adopted

3

3

Results from Source Testing Overview

Purpose

- Quantify toxic air contaminant emissions from chromium alloy melting
- Assess effectiveness of existing pollution control devices

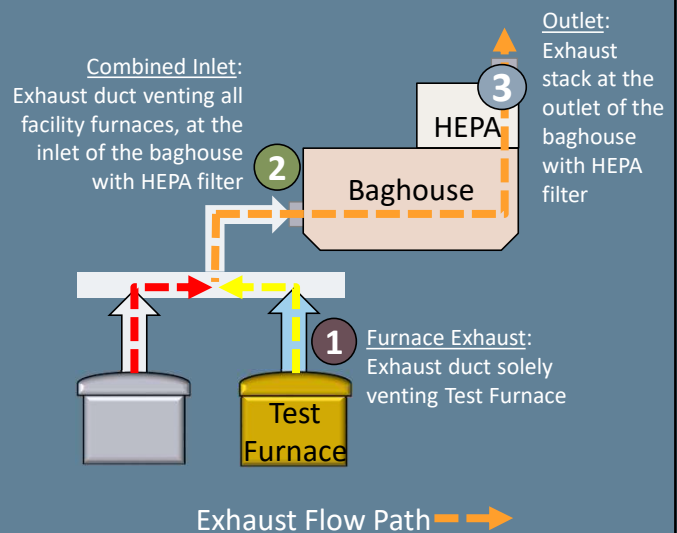
Approach

- Conduct source test at three facilities
- Sample toxic air contaminants at the melting furnace and before and after pollution control
- Facilities would be anonymous

Results

- Formation of hexavalent chromium emissions from chromium alloy melting
- HEPA reduced toxic air contaminant emissions

Sampling Locations



4

4

Purpose and Applicability

- Purpose
 - Reduce toxic air contaminant emissions from chromium alloy melting operations
- Applicability
 - Any process conducted where chromium alloy is melted, poured, casted, and finished
 - Chromium alloy is defined as any metal that contains 0.5% chromium or greater
- Universe of Facilities and Equipment
 - 11 facilities identified
 - 43 permitted furnaces
 - 17 permit-exempt furnaces

Exemptions

Heat treating or other metalworking facilities that do not melt metal

Small quantity operations, educational facilities, and jewelers

Equipment subject to Rule 1407

Equipment subject to Rules 1420.1 & 1420.2

5

5

General Overview of Rule 1407.1



Emission Control Requirements



Fugitive Emission Requirements



Testing and Monitoring Requirements



Recordkeeping



Exemptions and Prohibitions



6

6

Emission Control Requirements

- Aggregate Hexavalent Chromium Emission Limit
 - Based on distance to closest sensitive receptor
- Source Testing
 - Initial Source Testing
 - Periodic Source Testing
 - Every 5 years
 - Failed Parameter Monitoring Source Testing
 - Within 6 months of parameter monitoring failure
- Parameter Monitoring
 - Continuously demonstrate control equipment is working properly



Distance to Closest Sensitive Receptor	Emission Limits		
	< 50 meters	50 to 100 meters	> 100 meters
Hexavalent Chromium (Facility-Wide)	0.40 mg/hour	1.5 mg/hour	1.8 mg/hour

Fugitive Emission Requirements

Building Enclosure Requirements



Contains fugitive emissions

Housekeeping Measures



Removes emissions before they can become fugitive

Questions/Comments



Uyen-Uyen Vo
Program Supervisor
Toxics and VOC Rules



Small Business Assistance Report on February 2021 Activities for LG&SBA Advisory Group Meeting of 3/12/2021

1

Services Offered – February

- Permit Application Assistance 179
- Fee Review Committee Request 2
 - 2 Granted (Waive Late Fees, Payment Plan)
- Air Quality Permit Checklist Processed 62
- Variance Request Assistance 1

3/12/2021

February 2021 Report

2

Permit Assistance – February

- 179 Activities Providing Help with Permit Applications. Examples include:
 - 29 *General Contractors/Consultants/Architects*
 - 15 *Restaurants*
 - 17 *Manufacturing Facilities*
 - 11 *Retail Stores*
 - 12 *Dry Cleaners/Garment Cleaners*
 - 12 *Auto Body and Repair Shops*
 - 17 *Warehouses (Storage/Distribution)*
 - 5 *Fuel Dispensing Facilities*

3/12/2021

February 2021 Report

3

Activities – February

- No on-site consultations conducted
- Event(s) Attended
 - No Events Attended

3/12/2021

February 2021 Report

4

Dry Cleaner Grants Issued (as of 2/2021)

■	Professional Wet Cleaning	165
■	CO ₂ Machines	4
■	Hydrocarbon (funds expended)	488

3/12/2021

February 2021 Report

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Small Business Activity February 2020 – February 2021

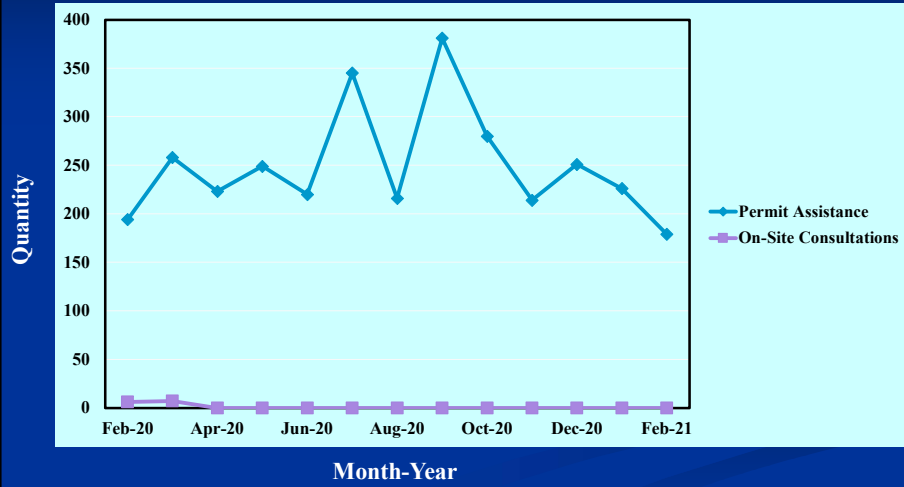
ACTIVITY	Permit Assistance	On-Site Consultations	Variance Assistance	Fee Review Requests	Air Quality Permit Checklists
Feb-2020	194	6	0	3	63
Mar-2020	258	7	0	3	47
Apr-2020	223	0	0	3	49
May-2020	249	0	0	3	65
Jun-2020	220	0	0	1	51
Jul-2020	345	0	2	3	110
Aug-2020	216	0	0	2	57
Sep-2020	381	0	0	2	65
Oct-2020	280	0	0	3	84
Nov-2020	214	0	15	2	50
Dec-2020	251	0	43	2	59
Jan-2021	226	0	3	1	70
Feb-2021	179	0	1	2	62
TOTAL	3236	13	64	30	832

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