



Compliance Advisory Regarding Amended Rule 1469

Advisory No. 1469 2019-1

April 3, 2019

The South Coast Air Quality Management District (SCAQMD) is issuing this second compliance advisory regarding the November 2, 2018 amendment to Rule 1469 – *Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations*. The Rule 1469 amendment includes new and ongoing measures to minimize emissions from operations subject to the rule. This advisory provides a brief summary of the additional deadlines and requirements, as well as resources to obtain more information about those requirements.

The amended rule requires additional control equipment to be permitted and installed for certain tanks, establishes initial and ongoing source test requirements, and establishes new parameter monitoring for collection efficiency for add-on air pollution control equipment (e.g., scrubbers and HEPA filters). These requirements are dependent on the Tank Tier. Please refer to the previous Compliance Advisory No. 2018-1 and Rule 1469 for information on tank tier designation.

BUILDING ENCLOSURES

1469(e) – Beginning **May 1, 2019**, all Tier II and Tier III tanks must be operated in a building enclosure where the combined area of all enclosure openings shall not exceed 3.5% of the building enclosure envelope. Please refer to the rule and the Ongoing Compliance Status and Emissions Report template for acceptable enclosure methods and calculation procedures. Links to those documents are provided in the “Additional Resources” section of this advisory.

1469(e)(2)-(e)(5) – Requirements have been added that limit the distance from openings to tanks, limit the duration an opening is allowed to be open, restrict openings that allow crossdrafts and openings that are closest to schools or sensitive receptors. See Rule 1469(e) for details of these requirements.

PERMIT APPLICATION DEADLINES

1469(h)(4)(B) – Previously existing Tier III tanks may be required to be vented to add-on air pollution control equipment, which would require a permit. All required permit applications for both the tanks and the new control equipment, including fees, shall be submitted to SCAQMD by the following deadlines:

- Chromic Acid Anodizing Facilities **May 1, 2019**
- Hard Chromium Electroplating **November 2, 2019**
- Decorative Chromium Electroplating **April 30, 2020**

If a facility conducts more than one process, then the earliest date will apply.

1469(h)(4)(C)(i) – The air pollution control equipment referenced above must be installed no later than 12 months after SCAQMD issues a facility a Permit to Construct.

1469(h)(4)(B)(ii) – Effective immediately, until the add-on air pollution control equipment has been installed on previously existing Tier III tanks, facilities must cover the tanks no later than 30 minutes after ceasing operation of the tanks. Tank covers shall be free of holes, tears, and gaps.

REQUIREMENTS PRIOR TO INSTALLATION OF AIR POLLUTION CONTROL DEVICES AND OTHER CONSTRUCTION

1469(f)(8) – Before cutting roof surfaces, the affected surface areas must be cleaned using a HEPA vacuum. Facilities are required to notify SCAQMD, at 1-800-CUT-SMOG, 48 hours prior to cutting the roof. In addition, facilities shall minimize fugitive emissions during cutting activities by using temporary enclosures, HEPA vacuums, or similar methods.

NOTE: Pursuant to Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities), an asbestos survey is required prior to any renovation or demolition – such as cutting roof surfaces, modification of ducting, or other activities – that may disturb any suspect asbestos-containing building materials. Rule 1403 also includes notification, work practice, handling, and disposal requirements. For more information please contact the SCAQMD Asbestos Hotline at (909) 396-2336 prior to initiating any such activities.

SOURCE TESTING

1469(k) – Initial source testing is required for any sources subject to the emission limits of 1469(h)(2) or (h)(4). A source test protocol must be submitted by the facility, and then reviewed and approved by SCAQMD, prior to conducting the source test. The deadline to submit source test protocols depends upon the facility-wide, permitted annual ampere-hours, as follows:

- **May 1, 2019** for facilities permitted for greater than 20,000,000 amp-hr/yr;
- **November 2, 2019** for facilities permitted for between 1,000,000 amp-hr/yr and 20,000,000 amp-hr/yr; and
- **April 30, 2020** for facilities permitted for 1,000,000 amp-hr/yr or less.

Source tests shall be conducted no later than 120 days after approval of the initial source test protocol, and subsequent source tests are required as set forth on Table 3 on page 24 of the rule.

1469(k)(1)(C) – An existing source test conducted after January 1, 2015 may be used as the initial source test if it is representative of the current operation, and it demonstrates compliance with the applicable rule emission limits.

NOTE: Any process tanks heated with gas-fired heaters may be subject to the NOx emission requirements of Rule 1147 (NOx Reductions from Miscellaneous Sources), and may require source testing. If you have questions regarding compliance with Rule 1147, please contact Supervising Inspector Amanda Sanders at (909) 396-3381.

INSPECTION, OPERATION, AND MAINTENANCE REQUIREMENTS

1469(n)(3) – As of January 31, 2019, for Tier II tanks without an add-on control, a calibrated temperature data logger must be installed and maintained.

1469(n)(4) – As of January 31, 2019, facilities operating Tiers I,II, and III tanks shall comply with the applicable inspection and maintenance requirements in Appendix 4, Table 4-2 (on page 57), which include:

- Calibrated temperature gauges.
- Weekly visual inspection of collection slots and push air manifolds to ensure there are no obstructions or clogs.
- Once every 180 days, clean slots and push air manifolds.
- Once every 180 days, measure slot velocity of each slot, using an anemometer or approved device.

PARAMETER MONITORING

1469(m)(1)(A) – For facilities conducting an initial source test, devices must be installed to measure the following pressures: static pressure in the collection manifold; static pressure in the push manifold (if applicable); and differential pressure across each stage of the control device. Monitoring of these pressures shall begin:

- Immediately for differential pressure across existing air pollution control equipment; and
- Immediately for facilities using an existing source test pursuant to (k)(1)(C); or
- Within 60 days after completion of the initial source test.

1469(m)(1)(B) – The velocity of the collection slots of add-on air pollution control equipment shall be measured at least once every 180 days, beginning 60 days after the initial source test. The measurements shall be within the criteria specified in Table 5 on page 32 of the rule. (For facilities using an existing source test pursuant to 1469(k)(1)(C), the measurements shall meet the criteria immediately.)

ADDITIONAL RESOURCES:

Updated recordkeeping forms, reporting forms, and Rule 1469 Compliance Advisories may be found on the SCAQMD Compliance webpage at:

<http://www.aqmd.gov/home/rules-compliance/compliance>

Rule 1469 may be found on the SCAQMD website at:

www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf?sfvrsn=4

Each facility is responsible for following all rules. If you have further questions regarding Rule 1469, please contact the following:

- **Compliance & Enforcement:** Your assigned SCAQMD Inspector, or Senior Enforcement Manager Jason Aspell at (909) 396-2491.
- **Engineering & Permitting:** The Coating and Metal Finishing group at (909) 396-3393.
- **Source Test Engineering:** Sr. Air Quality Engineer Bill Welch at (909) 396-2243.