



Proposed Amended Rule 1407

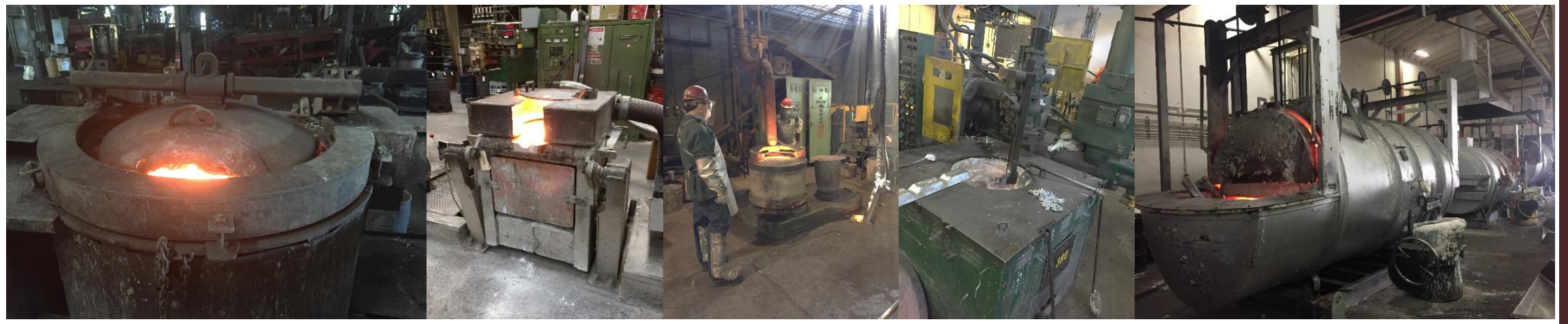
Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Chromium Metal Melting Operations

Working Group Meeting #9
July 17, 2019

Teleconference Number: 1-888-450-5996
Passcode: 100040

Agenda

- Summary of Public Workshop
- Discuss Revised Proposed Rule Language

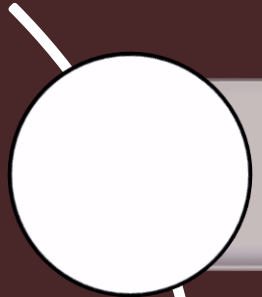


Public Workshop – June 19, 2019

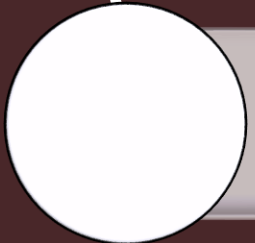
- Presented
 - Background
 - Proposed Rule Language
 - Impacted Facilities
 - Scope of Socioeconomic Impact Assessment
 - California Environmental Quality Act (CEQA)
- Received
 - 4 comment letters

Revised Proposed Rule Language

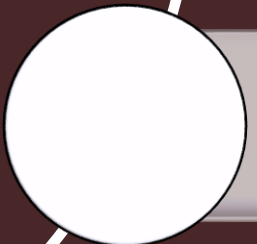
Overview



Revised proposed rule language incorporates comments from Public Workshop



Presentation will highlight new and revised key provisions



Requesting further input from stakeholders where issues remain

Definitions (subdivisions (c))

(c)(25) – Rerun Scrap

Public Workshop Rule Language

- Restricted to rerun scrap generated at the facility

Revised Rule Language

- Includes scrap generated at another location from materials exclusively generated at the facility
 - Must include documentation

- If a facility can demonstrate that the rerun scrap generated at another facility came from material generated at the facility, then it will be considered rerun scrap and not scrap
 - Demonstration can be customer paperwork identifying source of material, material specification sheets, laboratory analysis, etc.

Emission Control Requirements (subdivision (d))

(d)(4) – Facility-Wide Mass Emission Limits	
Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">Arsenic: 0.095 pounds/yearCadmium: 0.74 pounds/yearNickel: 12.2 pounds/year	<ul style="list-style-type: none">Arsenic: 0.000066 pounds/hourCadmium: 0.000514 pounds/hourNickel: 0.008480 pounds/hour
<ul style="list-style-type: none">Revised limits reflect more detailed assessment of worst-case facilityReturned to hourly limit to simplify compliance determinationNon-detect result will result in compliance for almost all situations	

Emission Control Requirements (subdivision (d))

(d)(7) – Visible Emissions to Emission Control Device

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">No provision	<ul style="list-style-type: none">Visible emissions cannot meander out of direct path from the metal melting operations to the collection location of the emission collection system
<ul style="list-style-type: none">Allows an inspector to observe emissions failing to be collected by emission collection system	

Emission Control Requirements (subdivision (d))

(d)(8) – Permit Application Submittal

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• No provision	<ul style="list-style-type: none">• By July 1, 2020, a facility must submit a permit application for emission control devices that will be used for existing furnaces
<ul style="list-style-type: none">• Ensures adequate time for processing applications	

Building Enclosure Requirements (subdivision (f))

(f)(1) – Building Enclosure

Public Workshop Rule Language

- Close at least one end

Revised Rule Language

- Close all enclosure openings on one end for each pair of opposing ends

- Provides additional clarity for building enclosure requirements

Source Testing Requirements (subdivision (g))

(g)(1) – Source Test Protocol Submittal

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• At least 60 days prior to conducting source test	<ul style="list-style-type: none">• By 10/1/20 for initial test and no later than three months prior to deadline for periodic source tests
<ul style="list-style-type: none">• Specifies when protocol should be submitted rather than a waiting period	

Source Testing Requirements (subdivision (g))

(g)(8)(A) – Source Test Method, Sample Volume	
Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">No provision for sample volume	<ul style="list-style-type: none">Requires sample volume to:<ul style="list-style-type: none">Be sufficient to achieve method report limit; or150 dry standard cubic feetMethod reporting limit is 0.2 µg/sample
<ul style="list-style-type: none">Establishes a non-detect value for source test results	

Source Testing Requirements (subdivision (g))

(g)(8)(B) – Source Test Method, Non-Detect

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">No provision for handling non-detect results	<ul style="list-style-type: none">If all source test runs are below the limit of detection, the compound can be identified as non-detectIf one or more source test runs are above the limit of detection, assign half of the limit of detection for the run(s) below the limit of detection
<ul style="list-style-type: none">Follows guidelines in <u>South Coast AQMD “Risk Assessment Procedures for Rules 1401, 1401.1 and 212”, Version 8.1, Appendix III</u>Specifies procedures on calculating source test results if some source test runs are below the limit of detection	

Material Testing Requirements (subdivision (h))

(h)(1) – Determining Composition of Alloys

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• No sunset date	<ul style="list-style-type: none">• Provisions retained until 1/1/21 coinciding with sunset of (k)(2) exemption
<ul style="list-style-type: none">• Test methods are old/outdated• Additional test methods included in (h)(3)	

Material Testing Requirements (subdivision (h))

(h)(2) – Analyses of Alloys and Baghouse Catch

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">Provisions in recordkeeping ((g)(2) and (g)(3))	<ul style="list-style-type: none">Moved provisions to materials testing
<ul style="list-style-type: none">Clarified rule language by separating out material testing requirement from recordkeeping requirement	

Material Testing Requirements (subdivision (h))

(h)(3) – Materials Testing Methods

Public Workshop Rule Language

- Original rule language
- References old/outdated ASTM methods

Revised Rule Language

- U.S. EPA-approved methods
- ASTM International methods
- Use of metallurgical assay
- Executive Officer-approved methods

- Removes old/outdated ASTM methods and allows facilities to pick from a large suite of approved test methods

Emission Control Device Monitoring (subdivision (i))

(i)(5) – Smoke Test

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• Requires facilities to conduct a smoke test• No provision for when a smoke test fails	<ul style="list-style-type: none">• Add requirement that facility must pass smoke test• Add provision that furnaces cannot be operated until smoke test is passed
<ul style="list-style-type: none">• Clarifies rule language and establishes consequence for failure of smoke test	

Emission Control Device Monitoring (subdivision (i))

(i)(6)(C) – Canopy Hood	
Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">No provision	<ul style="list-style-type: none">Establishes velocity requirements for canopy hood collection systemsProhibits operations with cross drafts
<ul style="list-style-type: none">Provides requirements for commonly used hood design	

Exemptions (subdivision (k))

(k)(1) – Facilities melting less than one ton/year

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• Subject to all recordkeeping provisions	<ul style="list-style-type: none">• Subject to only recordkeeping of quantities of raw materials processed
<ul style="list-style-type: none">• If facilities fall under this exemption, it is not necessary for the additional records to be kept	

Exemptions (subdivision (k))

(k)(3) – Metal or Alloy Purity Exemption

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">8,400 tons/year of material with less than 0.004% cadmium and 0.002% arsenic	<ul style="list-style-type: none">Adds an exemption for 84,000 tons/year of material with less than 0.0004% cadmium and 0.0002% arsenic
<ul style="list-style-type: none">Allows facilities with very clean materials to process more materials	

Exemptions (subdivision (k))

(k)(7) – Rules 1420 and 1420.2 Exemption

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">Exempt from Rule 1407	<ul style="list-style-type: none">Exempt from all Rule 1407 provisions except for (d)(5)<ul style="list-style-type: none">Limit temperature of gas stream entering into the emission control device to < 360°F, unless 99% control can be demonstrated for arsenic and cadmium
<ul style="list-style-type: none">Maintains requirement from ATCM until Rules 1420 and 1420.2 can be amended to include this provision	

Exemptions (subdivision (k))

(k)(9) – Health Risk Assessment and Air Toxics Inventory Report

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">No provision	<ul style="list-style-type: none">Facilities with a Health Risk Assessment with a maximum individual cancer risk less than ten in one million or an Air Toxics Inventory Report with a Facility Priority Score of less than 10 are exempt from subdivision (d)
<ul style="list-style-type: none">Facilities that have conducted extended risk analysis demonstrating low risk to the surrounding community will not be required to put on additional controls	

Exemptions (subdivision (k))

(k)(11) – Repair and Maintenance

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• Metal grinding and metal cutting operations conducted during repair and maintenance are exempt	<ul style="list-style-type: none">• Includes dip soldering and brazing operations conducted during repair and maintenance included in exemption
<ul style="list-style-type: none">• These minor activities are not conducted on production scale	

Smoke Test (Attachment B)

Public Workshop Rule Language	Revised Rule Language
<ul style="list-style-type: none">• Smoke release procedure and observation contained in single paragraph• Successful result not established	<ul style="list-style-type: none">• Separate smoke release procedure and observation into two paragraphs• Include passing smoke test determination
<ul style="list-style-type: none">• Clarifies test methodology and provides criteria for successful result	

Next Steps



Action	Target Dates
Stationary Source Committee	July 26, 2019
Final Draft Documents	August 7, 2019
Public Hearing	September 6, 2019

Contact Information

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