

South Coast Air Quality Management District **REGULATORY ADVISORY**

ATTN: Owners and operators of facilities performing hard chromium electroplating or chromic acid anodizing

Upcoming Deadlines and Compliance Requirements

BACKGROUND

In 1998, the South Coast AQMD adopted Rule 1469 – *Hexavalent Chromium Emission from Chromium Electroplating and Chromic Acid Anodizing Operations*. Rule 1469 was last amended in 2021. Rule 1469 may be obtained at <u>https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1469.pdf?sfvrsn=4</u>.

In 2023, the California Air Resources Board (CARB) amended the *Airborne Toxic Control Measure for Chromium Electroplating and Chromic Acid Anodizing Operations* (<u>Chrome ATCM</u>). Beginning January 1, 2026, functional plating facilities will be subject to more stringent requirements, including:

- Lower emission limits for Tier III Tanks (Rule 1469 "Tier III Hexavalent Chromium Tanks")
- Increased source tests frequency required every two years for Tier III tanks

Source tests must be conducted in 2024 or 2025 to demonstrate compliance. Specific requirements are discussed later in this advisory.

South Coast AQMD is currently amending Rule 1469 to align with the Chrome ATCM and the proposed requirements will be at least as stringent as the Chrome ATCM.

CHROME ATCM REQUIREMENTS

PLEASE NOTE – Beginning January 1, 2026, the following requirements apply for functional plating facilities (facilities that conduct hexavalent hard chrome plating or chromic acid anodizing):

Tier III Tank Requirements (See referenced section of Chrome ATCM)

Functional chrome plating tank must meet an emission limit of 0.00075 mg/amp-hr as measured downstream of the add-on air pollution device (§ 93102.4(c)(2))

- Emission limit is lower than 0.0015 mg/amp-hr in the current revision of Rule 1469
- Tank required to be controlled by an add-on air pollution control device (i.e. not exclusively controlled by in-tank controls, such as chemical fume suppressants or poly-balls)

Tier III non-plating tank must meet one of the emission limits below as measured downstream of the addon air pollution device depending on its configuration (§ 93102.4(f)(2)(A) through (C))

- If connected to an add-on air pollution device that also controls a functional chrome plating tank, it must meet a combined emission limit of 0.00075 mg/amp-hr
 - Emissions are evaluated from all Tier III tanks during a single source test
 - Unlike Rule 1469, the Chrome ATCM does not allow multiple source tests to demonstrate compliance for specific emission limits
- If not connected to an add-on air pollution that also controls a functional chrome plating tank
 - Add-on air pollution (exhaust rate \leq 5,000 ft³/min) must meet an emission limit of 0.20 mg/hr
 - Same emission limit as Rule 1469

- Add-on air pollution (exhaust rate > 5,000 ft³/min) must meet an emission limit of 0.004 mg/hr-ft²
 - Rule 1469 emission limit based on the square footage of all tanks required to be controlled by an air pollution control device
 - Chrome ATCM emission limit based on the square footage of only Tier II and Tier III tanks

Source Testing Requirements (See referenced section of Chrome ATCM or Rule 1469)

- Conduct source test in calendar year 2024 or 2025 to demonstrate compliance with the January 1, 2026 deadline for all Tier III plating tanks and Tier III non-plating tanks. (§ 93102.7(a)(3))
 - Submit new source test protocol if changes made since prior source test (*Rule 1469(k)(4)(B)*)
 - Notify at <u>sourcetesting@aqmd.gov</u> at least 60 days before scheduled source test
- Conduct subsequent source tests to demonstrate meeting emission limits every two calendar years thereafter (that is, every two years after previous source test) ((\$ 93102.7(a)(3))

COMPLYING WITH CHROME ATCM AND RULE 1469 UNDER AMENDMENT

If your facility plans to install or modify add-on air pollution control device(s), or change or add permit conditions to comply with upcoming January 1, 2026 requirements, submit a complete permit application and required information to South Coast AQMD as soon as possible; complex applications may need additional time.

If changes are needed in the source test protocol to comply with upcoming January 1, 2026 requirements, submit the protocol to South Coast AQMD and obtain protocol approval prior to conducting a source test. Examples of changes that require a new source test protocol include:

- Tank dimensions
 Collection slots
- Ventilation flow rate

- Sampling location(s)
- Collection slotsSampling method
- Analytic method(s)
- It is recommended that the facility submit protocols at least 60 days before the date of the scheduled source test to allow time for review and approval; certain changes may need additional time. For other changes or questions regarding source tests, please reach out to the Source Testing contact below.

Submittal of a permit application or a source test protocol prior to the January 1, 2026 compliance deadline alone would <u>not</u> demonstrate compliance with applicable requirements. For estimated timelines for document review and approval, please reach out to the applicable South Coast AQMD contact.

For clarification on rule requirements and their respective deadlines, please reach out to Compliance & Enforcement.

ADDITIONAL RESOURCES

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

- Rule Development: Planning and Rules Manager Kalam Cheung at (909) 396-3281.
- Compliance & Enforcement: Your assigned South Coast AQMD Inspector.
- Engineering & Permitting: The Coating, Printing, Plating, and Aerospace Operations team at (909) 396-3393.
- Source Testing: Source Testing Manager Bill Welch at (909) 396-2243.

The Chrome ATCM final regulation order may be obtained at:

https://ww2.arb.ca.gov/sites/default/files/2024-01/Chrome%20Plating%20FRO_clean_29Jan2024.pdf

For additional information on the Chrome ATCM, please contact CARB at <u>chromeplatingatcm@arb.ca.gov</u> or visit <u>https://ww2.arb.ca.gov/our-work/programs/chrome-plating-atcm</u>

Table of Key Chrome ATCM Tier III Tank Emission Limit Requirements

Type and Configuration of Tier III Tank	Emission Limit	Chrome ATCM Requirement	Notes
Functional chrome plating tank (i.e. hexavalent hard chrome plating or chromic acid anodizing)	0.00075 mg/amp-hr	§ 93102.4(c)(2)	 Emission limit is lower than 0.0015 mg/amp-hr in Rule 1469(h)(2) Table 1 Tank required to be controlled by an add-on air pollution control device (i.e. not exclusively controlled by in-tank controls, such as chemical fume suppressants or poly-balls)
Tier III non-plating tank connected to same add-on air pollution device that also controls a functional chrome plating tank	0.00075 mg/amp-hr	§ 93102.4(f)(2)(A)	 Emissions are evaluated from all Tier III tanks during a single source test Unlike Rule 1469(h)(4)(A)(i), the Chrome ATCM does not permit multiple source tests to demonstrate compliance for specific emission limits
Tier III non-plating tanks controlled by an add-on air pollution control device (exhaust rate \leq 5,000 ft ³ /min)	0.20 mg/hr	§ 93102.4(f)(2)(B)	 Same emission limit as Rule 1469(h)(4)(A)(iii) Not allowed by Chrome ATCM if add-on air pollution control also connected to a functional chrome plating tank
Tier III non-plating tanks controlled by an add-on air pollution control device (exhaust rate > 5,000 ft ³ /min)	0.004 mg/hr-ft ²	§ 93102.4(f)(2)(C)	 Rule 1469(h)(4)(A)(iv) emission limit based on the square footage of all tanks required to be controlled by an air-pollution control device Chrome ATCM emission limit based on the square footage of only Tier II and Tier III tanks Not allowed by Chrome ATCM if add-on air pollution control also connected to a function chrome plating tank