

City of Paramount: SCAQMD Rule Development for Metal Processing Operations

City of Paramount
August 31, 2017

Rulemaking Process

Information Gathering



Initial Objective and Scope



Develop Rule Concepts



Draft of Proposed Rule Language

Stakeholder Working Group

- Comprised of stakeholders including industry, environmental groups, community members, and agencies
- Provides stakeholders opportunity to discuss elements of proposed rule with staff
- Assist staff in understanding
 - Key issues and concerns
 - Industry terms, industry practices, etc.
- Working group meetings held throughout the rule development process and open to the public

Key SCAQMD Rulemaking for Metal Processing Operations

- **Rule 1430** – Control of Emissions from Metal Grinding Operations at Metal Forging Facilities (Adopted March 3, 2017)
- **Proposed Amended Rule 1469**
Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations; Emissions from Metal Finishing Operations (Proposal December 2017)
- **Proposed Rule 1435** – Control of Emissions from Metal Heat Treating Processes (Proposal in First Quarter 2018)
- **Proposed Rule 1407** – Control of Toxic Emissions from Metal Melting (Proposal in First Quarter 2018)
- **Proposed Rule 1445** – Control of Emissions from Laser Arc Cutting (Proposal in Second Quarter 2018)





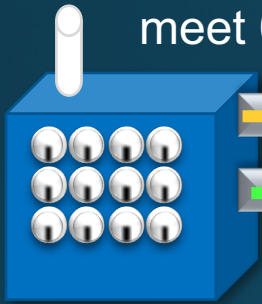
Rule 1430 – Background

- **Purpose** – Reduce toxic and particulate matter emissions, in addition to odors, from metal grinding and cutting operations at metal forging facilities
- **Applicability** – Metal forging facilities that conduct metal grinding or cutting operations onsite
- **Affected Sources** – 22 identified (4 facilities in Paramount)
 - Carlton Forge Works
 - Mattco Forge Inc
 - Press Forge Inc
 - Weber Metals Inc
- **Industry Description** – Primarily titanium, stainless steel, or aluminum forging for the aerospace industry

Rule 1430 Approach

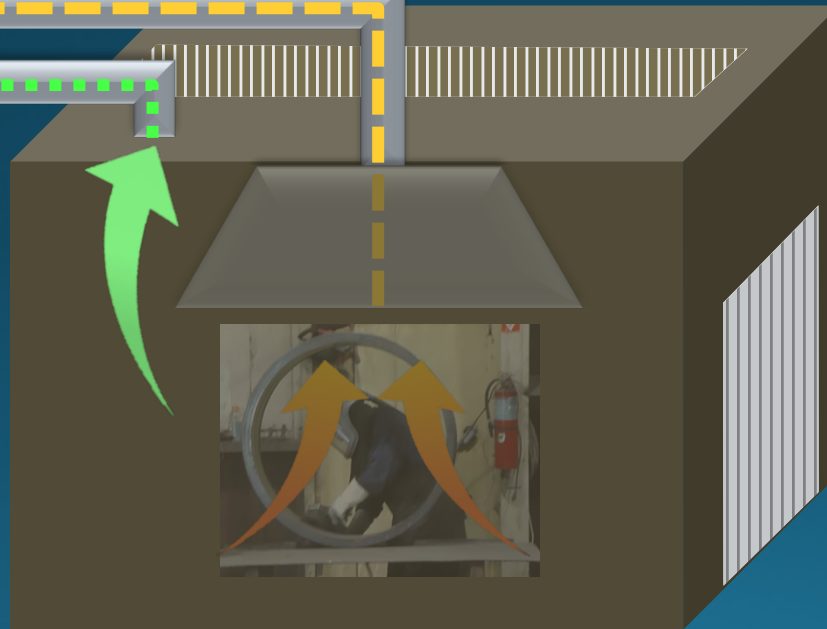
Point Source Emission Controls

Pollution controls for metal grinding stations must meet 0.002 grains/dscf, plus HEPA filtration



Negative Air for Total Enclosure

Facilities within 500 feet of a sensitive receptor or 1,000 feet of a school or early education center



Total Enclosure

Total enclosure closing openings to further contain fugitive metal particulate

Housekeeping Measures

Clean any remaining fugitive metal particulate

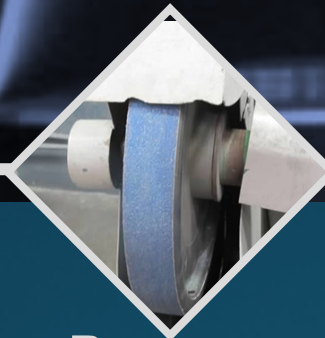
Odor Contingency Measures

If facility receives 4 confirmed odor complaints* in a 6-month period, must select and implement measure to reduce odors



Operational Change

- Changing ingress and egress openings
- Moving grinding stations



Process Change

- Change grinding element
- Change materials applied to grinding piece



Enhancement to Total Enclosure

- Installation of booths or barriers for grinding stations
- Upgrade openings used for ingress or egress



Other Odor Reducing Measure

- Any other measure or modification that can help to reduce odors or minimize odors

* Complaints for the same event must from different households and odors must be related to metal grinding and cutting operations

Rule 1469 - Background

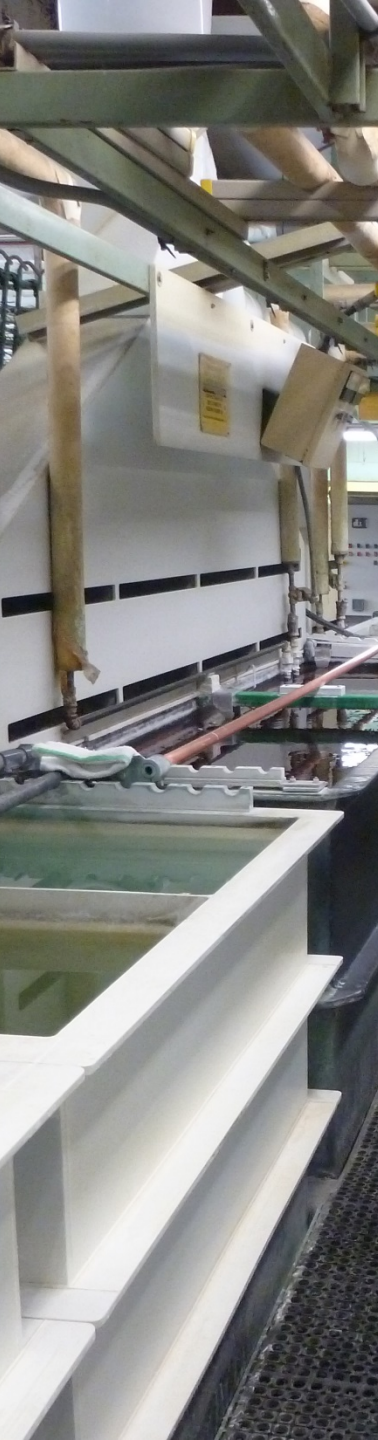
- **Purpose** – Control hexavalent chromium emissions from chromium electroplating and chromic acid anodizing operations
- **Applicability** – Facilities performing chromium electroplating or chromic acid anodizing
- **Affected Sources** – 115 facilities (1 facility in Paramount)
 - Anaplex Corporation (Anaplex)
- **Industry Description** – Products for aerospace/defense, automotive, electronics, fixtures, and machinery/industrial equipment





Proposed Amended Rule 1469 – Background

- Ambient monitoring near multiple Rule 1469 facilities have shown high concentrations of hexavalent chromium
- As a result staff has been re-evaluating the overall efficacy of Rule 1469
- Based on findings, need to amend Rule 1469 to:
 - Address findings from air monitoring at Rule 1469 facilities:
- Provide consistency with 2012 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chromium Electroplating and Anodizing Tanks
- Account for the 2015 Revised OEHHA Guidelines for Estimating Health Risk



Initial Key Recommendations for PAR 1469

- Requirements
 - Operations within Building Enclosures
 - Additional Housekeeping and Best Management Practices
 - New Requirements for Hexavalent Chromium-Containing Tanks
- Considerations
 - Triggers for Permanent Total Enclosures
 - Triggers for Ambient Monitoring
 - Lower Emission Rate Limits

Next Steps – PAR 1469

- Continue working Stakeholders
- Public Workshop in September
- Public Hearing December 2017