

MEMORANDUM

TO: Community Advisory Council Members

FROM: Rebecca Armstrong

DATE: July 28, 2010

SUBJECT: Proposed Repeal of Rule 334, Control of Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing

Enclosed please find the draft repealed Rule 334, Control of Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing for your review.

This rule is being repealed because the state Airborne Toxics Control Measure (ATCM) requirements are more stringent than the District Rule 334 requirements. The California Air Resources Board (CARB) developed an ATCM for Hexavalent Chrome Plating and Chromic Acid Anodizing Processes and Facilities in 1988 and subsequently revised it in 2006. The revised version of the ATCM became effective on October 24, 2007.

Air districts throughout the state are required to either implement and enforce the ATCM or adopt a more stringent rule. As a general policy, the District implements statewide ATCMs in order to promote statewide consistency and avoid the costs and resource expenditures that would be necessary for what would be an unnecessary rule development process. As a result, we are proposing to repeal Rule 334 as it is no longer applicable.

At the CAC's August 11, 2010 meeting, we will be requesting the CAC's recommendation to the APCD Board of Directors that Rule 334 be repealed. We anticipate bringing this new rulemaking effort to the Board on September 16, 2010.