



March 9, 2017

Mr. Robert Gottschalk, Air Quality Specialist
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Gottschalk:

Re: Comments on Proposed Amended Rule 219

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates this opportunity to provide comments on Proposed Amended Rule 219. SCAP represents 83 public agencies that provide essential water supply and wastewater treatment to nearly 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and biogas.

The purpose of this letter is to expand upon comments provided by our members at the March 2, 2017 public workshop. We greatly appreciate the dialog with staff during the workshop, which helped focus our comments and recommendations outlined below.

Passive Carbon Adsorbers (d)(10):

AB 1826 requires local jurisdictions across the state implement an organic waste recycling program. Food waste can be recycled through composting and anaerobic digestion, which can be used to produce a renewable fuel. One of our members is planning on installing holding tanks to support the processing of food waste slurry from an existing material recovery facility that will subsequently be transported to a wastewater treatment plant for digestion. In order to minimize potential odors during the displacement of headspace within these tanks, we respectfully request the following modification to this provision that is consistent with the existing Rule 219 language which addresses similar facilities at wastewater treatment plants:

Passive carbon adsorbers, with a maximum vessel capacity of no more than 120 gallons, without mechanical ventilation, and used exclusively for odor control at wastewater treatment plants, food waste slurry storage, or sewer collection systems, including sanitary sewers, manholes, and pump stations.

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Welding Equipment, Oxygen Gaseous Fuel-Cutting, Laser Cutting Equipment (e)(8):

As discussed during the public workshop, we have concerns about how the operation and maintenance of existing infrastructure could be impacted by the proposed amendment of this provision. Due to the challenge of identifying Material Safety Data Sheet (MSDS) information for existing infrastructure and the proposed low trigger levels for chromium, nickel, cadmium and lead, we would need to assume that cutting any metals would trigger permitting. To better understand the potential impacts from cutting these alloys, we request that health risk analyses be provided for public review. Based upon the discussion at the public workshop, it's our understanding that the production of metal parts is the primary concern to be address by the proposed amendment. In order to minimize the permitting of negligible sources, we respectfully propose the following modification of this provision:

Welding equipment, oxygen gaseous fuel-cutting equipment, hand-held plasma-arc cutting equipment, hand-held laser cutting equipment, laser etching or engraving equipment and associated air pollution control equipment. This exemption does not include ~~anythis~~ equipment ~~that is if~~ used to cut stainless steel, or alloys containing 0.1% by weight or more of chromium, nickel, cadmium or lead, or laser cutting, etching and engraving equipment that are rated more than 400 watts. Cutting activities associated with maintaining carbon or metal alloy infrastructure is exempt from permitting.

Although not included in our proposed amended language, we are concerned that many metal manufacturers may not be focused on the pollution potential from cutting certain alloys. As a result, MSDS information frequently lists a percentage chromium, nickel, cadmium and lead content of "< 1 percent". The proposed limit of 0.1 may inadvertently limit the use of these materials, so we recommend that staff review available MSDS sheets for various metals to ensure that the proposed limit is feasible at this time. Finally, the staff report should be updated to reflect the amended version of this provision.

Abrasive Blast Cabinets (f)(2):

The amendments propose to remove the exemption for abrasive blast cabinets 53 cubic feet or less when materials containing arsenic, beryllium, cadmium or lead are used as blast media or subject to blasting. As voiced during the public workshop, we have concerns that this requirement will capture the multiple cabinets at our members' facilities that can be used to blast small parts as part of intermittent maintenance operations. These cabinets with filters are typically located inside a shop environment. To better understand the potential impacts posed by use of these abrasive blast cabinets during such maintenance operations, we request that health risk analyses be provided for public review. However, at this time, SCAP respectfully requests that this exemption be maintained without modification.

Mr. Gottschalk

March 9, 2017

Thank you for the opportunity to comment on Proposed Amended Rule 219. If you have any questions regarding our comments, please do not hesitate to contact Mr. David Rothbart of the Los Angeles County Sanitation Districts, SCAP Air Quality Committee Chair at (562) 908-4288, extension 2412.

Sincerely,



Steve Jepsen, Executive Director

cc: Ms. Susan Nakamura, SCAQMD
Mr. David Ono, SCAQMD