

# Guideline for Calculating and Reporting Emissions from Laser or Plasma Cutting of Metal Materials Operations

Revised March 2025

This guideline document is based on the <u>Emission of Fume, Nitrogen Oxide and Noise in Plasma</u> <u>Cutting of Stainless and Mild Steel</u>. Sections of this document are provided by U.S. EPA in AP-42 Chapter 12. Note that this study evaluates emissions resulting from plasma cutting operations only, but the methodology is also used for laser cutting operations in this guideline since laser cutting emission factors are not available in AP-42.

# PM Emissions Based on Operating Time

For purposes of this guideline, particulate matter emissions (PM) are based on emissions of fumes. The tables from the U.S. EPA-cited document have been converted into imperial units.

Material, thickness	Dry (lb/min)	Semi-Dry (lb/min)	Wet (lb/min)
Mild steel, 8 mm	0.057	0.0088	0.00088
Stainless steel, 8 mm	0.088	0.0101	0.0011
Stainless steel, 35 mm	0.0075	0.00066	0.000044

# Emissions of Fumes in Plasma Cutting of Mild and Stainless Steel

If source-specific information is not available, the default emission factor for mild steel is 0.057 lb of PM per minute of cutting operation. Likewise, the default emission factor for stainless steel is 0.088 lb of PM/min.

# Emissions of Fumes Expressed as Percent of Total Amount of Material Removed by Cutting

Material, thickness, cutting speed	Dry (%)	Semi-Dry (%)	Wet (%)
Mild steel, 8 mm, 5 m/min	5	0.5	0.05
Stainless steel, 8 mm, 3.5 m/min	7	0.7	0.07
Stainless steel, 35 mm, 0.375 m/min	1	0.1	0.01

If source-specific information is not available, the default emission factor for mild steel is 0.05 lb of PM/lb of metal removed. The default emission factor for stainless steel is 0.07 lb of PM/lb of metal removed.

# PM Emissions Based on Amount of Material Cut

The amount of material removed is estimated from the volume of metal removed by the cut multiplied by the density of the metal cut.

The volume of metal removed can be estimate by the length of the cut multiplied by the kerf width (width of the cut) multiplied by the depth of the cut.

The metal density is based on SDSs. For metal scrap or maintenance metal cutting, the following default densities can be used. The metal density of mild steel is 0.284 lb/in<sup>3</sup>. The metal density of stainless steel is 0.28 lb/in<sup>3</sup>.

Amount of material, lb = length, in x kerf width, in x depth, in x metal density,  $lb/in^3$ 

# Control Technology

The AP-42 emission factors are for operations without controls. Plasma arc cutting with controlled emissions may apply the control efficiency to the emission equation in the AER Webtool. Typically, plasma arc cutting is controlled by filters in conjunction with a collection system. The default capture (or collection) efficiency for such a system is 90 percent, and the default control efficiency for filters is 99 percent. Note that both collection and control efficiency can be higher, such as in the case of a permanent total enclosure with HEPA filters. Reporters are advised to use source-specific information where available while providing supporting documentation.

For plasma arc cutting that is not enclosed, a capture efficiency is used to identify the quantity of emissions that are captured by the control device. The capture efficiency is multiplied by the control efficiency to derive an overall control efficiency. The overall control efficiency is entered into the AER Webtool in the Process page.

The default capture efficiency is 90 percent. If the default control efficiency (99 percent) is used, the overall control efficiency would be 0.89 percent ( $0.9 \ge 0.99$ ).

## NOX EMISSIONS

The tables from the U.S. EPA document have been converted into imperial units.

Emissions of Nitrogen Oxides	Dry (lb/min)	Semi-Dry (lb/min)	Wet (lb/min)
Mild steel, 8 mm	0.023	0.013	0.007
Stainless steel, 8 mm	0.023	0.011	0.006
Stainless steel, 35 mm	0.033	0.019	0.009

The default emission factor for mild steel is 0.023 lb of NOx/min. The default emission factor for stainless steel is 0.033 lb of NOx/min.

# TAC EMISSIONS

Default hexavalent chromium emissions from plasma cutting can be estimated by using the following emission factor (0.00022 pounds of hexavalent chromium ( $Cr^{+6}$ ) emitted per chromium (Cr) in metal removed) per South Coast AQMD permitting.

EF, lb  $Cr^{+6}$ /lb metal removed = (0.00022 lb  $Cr^{+6}$ /lb Cr in metal removed) x (weight fraction of Cr in metal from SDS)

So, if the stainless steel cut contains 20 percent chromium, the hexavalent chromium emission factor would be 0.000044 pound per pound of metal cut.

Other TAC emissions are estimated by multiplying the weight fraction of the TACs from SDSs by the PM emissions above. If SDS values are not available, the following defaults from the U.S. EPA referenced document may be used.

Components in Fume	Manganese (%)	Copper (%)	Nickel (%)
Mild Steel	1.4	1.4	0 (not detected)
Stainless Steel	4.4	0 (not detected)	10.3

# EXAMPLE

Stainless steel (8 mm thickness) was cut for a two hour duration in the data year using a semi-wet process. Since we record two hours per year, the emission factors need to be converted from mins to hours.

PM emission factor, lb/hr = 0.0101 lb PM/min x 60 min/hr = 0.606 lb/hr

NOx emission factor, lb/hr = 0.011 lb NOx/min x 60 min/hr = 0.66 lb/hr

Manganese emission factor,  $lb/hr = 0.606 lb/hr \ge 0.0267 lb/hr$ 

Hexavalent chromium emission factor, lb/hr

8 mm thickness, 3.5 m cut per min x 3/16 inch kerf 0.315 in x 137.8 in/min x 60 min/hr x 0.188 in = 489.6 in<sup>3</sup>/hr 489.6 in<sup>3</sup>/hr x 0.28 lb/in<sup>3</sup> = 137.1 lb metal cut/hr 137.1 lb metal cut/hr x 0.20 lb Cr/lb metal cut from SDS x 0.00022 lb Cr+6/Cr  $\cong$  0.00603 lb/hr

Nickel emission factor,  $lb/hr = 0.606 lb/hr \ge 0.063 lb/hr$ 

# Entering Data into the AER Webtool

Click on Emission Sources (ES) on the menu on the left-hand side. Then click on the orange Add New Emission Source button

Facility ID: 999901	Build Reporting Structure
Facility Comments	Emission Sources (ES) Classification
1. Facility Information     2. Status Update     3. Combustion Fuels     4. Emission Sources (ES)     5. Report Process/Emissions     6. Additional Toxic	Summary:       This section contains facility permit profile. Please make sure that every device has a specified Emission Source (ES). New emission sources can also be added.         Instruction:       Add Devices (emissions sources) by clicking "Add New Emission Source". Edit devices by clicking "Profile" under the Emission Source (ES) Column. Add emission data by clicking "Open" under the Emissions column. Upload storage tank data by clicking on link "Click here" below.
Substances Production and Usage 7. Perform Data Validation 8. Review Summaries	Storage Tank Emissions Batch File Import - <u>Click here</u> for more instructions.
9. Print Facility Report 10. Report Submission	Add New Emission Source

Enter data in the text boxes with the red asterisk, then click on the orange Categorize Emission Sources button.

Facility ID: 999901	Edit Emission Source									
Facility Comments	Edit Emission Source									
1. Facility Information 2. Status Update 3. Combustion Fuels 4. Emission Sources (ES)	Instruction: Add new e placards. 9 with a Red is correct	Instruction: Add new emissions sources using information found on permits, manufacturers specifications, or identifying placards. Select the Operating ES Status that best reflect the device's operation for this reporting period. All areas with a Red Asterisk (*) must be addressed. Note: Some devices have been pre-populated, verify that the information is correct								
5. Report Process/Emissions										
Substances Production and	Permitted									
Usage 7. Perform Data Validation 8. Review Summaries	PERP Equipment(CARB's Portable Equipment Registration Program)	• •								
9. Print Facility Report	Permit No									
to: Report Submission	Permit Device ID									
	Permit Equipment Description									
	AER Device ID	ES7 Assign new ID								
	ES Name	Plasma Arc Cutting *								
	Operating ES Status	Normal Operation   *								
	Comment									
	Emission Source Category	Categorize Emission Source *								
	Equipment	Other process equipment								
	Design Capacity	0.000000								
	Save or Save and ret	urn to List of Emission Sources or								
	Save and proceed to Proc	ess Reporting or <u>Cancel</u>								
	Optional: Save and Mark a	as Completed Click here to <u>delete</u> this emission source and associated data.								

## Click on the Other Process check box and click save.

Categorize Emission Source												
Permitted	A/N	Permit No	Permit Device ID	Permit Equipment Description	AER Device ID	ES Name						
No					ES7	Plasma Arc Cutting						
<ol> <li>Externa followir</li> <li>Interna followir</li> <li>Spray 0</li> <li>Other L followir</li> </ol>	al Combu ng Equipr ng Equipr ng Equipr Coating/S Jse of Or ng Equipr	stion Equipment nent: stion Equipment nent: Spray Booth (e.g ganics (e.g., coa nent:	: (e.g., boiler, dryer, oven, (e.g., internal combustio ., coatings, solvents, adh tings, solvents, inks, adh	, furnace, heater, afterburner, flare, kiln or i n engine (excluding vehicles), turbine or mi esives, etc.) <u>click here</u> to select one of the f esives, etc.) except in Spray Coating/Spray	ncinerator) <u>click here</u> cro turbine) <u>click here</u> following Equipment: Booth, <u>click here</u> to se	to select one the to select one of the elect one of the						
5. Liquid S	Storage 1	Fank (e.g. Under	ground, Aboveground, Sn	nall Tanks, Dispensing Systems) <u>dick here</u> t	o select one of the fol	lowing Equipment:						
6. Fugitive	e Compo	nents (Emission	Leaks from Process Comp	ponents per Rule 462, 1173 and 1176), <u>click</u>	<u>k here</u> to select all app	licable Equipment:						
7. Other P	Processes her proce	s (does not fit in ess equipment	any of the groups mentic	ned above), click <u>click here</u> to mark "Other	Process Equipment":							
						Save Cancel						

# Click on the orange Save and Proceed to Process Reporting button

Facility ID: 999901	Edit Emission Source	
Facility Comments	Eart Emission Joarce	
1. Facility Information 2. Status Update 3. Combustion Fuels 4. Emission Sources (ES)	Instruction: Add new e placards. S with a Red is correct	missions sources using information found on permits, manufacturers specifications, or identifying ielect the Operating ES Status that best reflect the device's operation for this reporting period. All areas Asterisk (*) must be addressed. Note: Some devices have been pre-populated, verify that the information
5. Report Process/Emissions 6. Additional Toxic	Permitted	
Substances Production and Usage 7. Perform Data Validation 8. Review Summaries	A/N PERP Equipment(CARB's Portable Equipment Registration Program)	• 6
0. Print Facility Report 10. Report Submission	Permit No Permit Device ID	
	Permit Equipment Description	
	AER Device ID	ES7 Assign new ID
	ES Name	Plasma Arc Cutting *
	Operating ES Status	Normal Operation V *
	Comment	
	Emission Source Category	Other Processes Categorize Emission Source *
	Equipment	Other process equipment
	Design Capacity	0.000000
	Save or Save and ret	um to List of Emission Sources or
	Save and proceed to Proc	ess Reporting r <u>Cancel</u>
	Optional: Save and Mark a	s Completed Click here to <u>delete</u> this emission source and associated data.

Click on the blue Open link next to Process ID P1

Process	Refe	rences										ж
Emissions	A/N	Permit No	Permit Device ID	Permit Device Description	AER Device ID	ES Name	ES Group Name	Source Category	Emissions?	Equipment	PERP	Release Location Linked
<u>Open</u>					ES7	Plasma Arc Cutting		Other Processes	Y	Other process equipment	N	NR
_		Process I	D	Source Group	,	Proces	s/Mater	ial/Fuel Na	ame	Status		Operation Type
Ope	<u>n</u>	P1	Oth	er Process Emis	sions					Work in progre	55	routine
Add P	roces	s/Mate	rial/Fu	1								
												ок

Click on the blue Open link in Step 1

### **Other Processes**

This reporting screen is for reporting activity data for other processes used in your facility which were not covered in previous reporting screens. Please provide specific information for every associated emission source. Please start with Step 1, edits to Step 1 may cause data in the following steps to reset. Combustion emissions need to be reported separately under external or internal combustion process categories. Combined emissions can also be reported here; however, it must be substantiated to avoid double reporting. Detailed instructions are available by clicking on Help icon in the tool bar.

Step	1: Process					Optional: Mark as Comple	eted
	AER Device ID	Permit Device ID	A/N	Process ID	Rule #	Activity	SCC
<u>Open</u>	ES11			P2	404	Metals and Alloys : Fabricated : Machining Operations : Other Not Classified	
						Click here to <u>delete</u> this prod	cess.

#### Step 2: Throughput

					Ann	ual Throug	hput				
<u>Open</u>											
Step 3	3: Criteria Emission	s (lbs)							Use <u>De</u>	fault Emission	Factors if available.
	Pollutant	EF Unit		Controlle	d EF	EF Data Source			Ove	erall CE	Emissions
Add	1 New										
Step 4	4: Toxic (TAC/ODC)	Emissions (Il	os)						Use <u>De</u>	fault Emission	Factors if available.
	TAC/ODC Group	CAS #	EF	Unit	Control	led EF	EF	Data Source		Overall CE	Emissions
Add	1 New										

## Choose the following options and click save.

EVICE ID	Permit Device ID		A/N	ID	#	Activity		SCO			
511				P2	404	Metals and Alloys : Fabricated : Machining Operations : Other Not Classified					
AER Device	ID		ES11	AER Dev	ice Name	Plasma Arc Cutting					
NON-PERMITTED		)		Permit D	evice ID						
Process ID			P2	Process	Name						
Process Cor	mmer	nt									
SCC											
Activity Code *	de *	Secto	r:								
		Meta	Is and	Alloys			~				
		Indus	try:								
		Fabri	cated				~				
		Opera	tion:								
		Mach	Machining Operations								
		Proces	icess:								
		Othe	r Not C	lassified			~				
Rule #		404		▼ * <u>/</u>	Add Rul	<u>e</u>					

# Click on the blue Open link in Step 2

### Other Processes

This r repor Step interr avoid	reporting scre ting screens. 1 may cause hal combustio double repor	en is for re Please pro <b>data in th</b> n process o ting. Detai	eporting a wide speci e followin categories iled instru	ctivity data fic informa <b>g steps to</b> . Combine ctions are	a for of ation fo <b>reset.</b> d emis availat	ther processes used or every associated Combustion emissions can also be r ole by clicking on H	d in your facility w d emission source. sions need to be re eported here; how Help icon in the too	hich wer Please s ported se ever, it n ol bar.	re not covere tart with Ste eparately un must be subst	d in previous <b>p 1, edits to</b> der external or tantiated to
Step 1:	Process								Optional:	Mark as Completed
	AER Device ID	Permit Devi	ice ID A/N	Process ID	Rule #		Activ	vity		SCC
Open	ES11			P2	404	Metals and Alloys : Fat	pricated : Machining Ope	rations : Ot	ther Not Classifie	ed
Open Step 3:	: Criteria Emi	issions (lbs	;)			Annual Throughp	ut	Use <u>De</u>	fault Emission	Factors if available.
	Pollutant	EF	Unit	Contr	rolled EF	EF	Data Source	Ove	erall CE	Emissions
Add	New									
Step 4	Toxic (TAC/	DDC) Emiss	sions (lbs)					Use De	efault Emission	Factors if available.
	TAC/ODC Group CAS # EF Unit					Controlled EF		Overall CE	Emissions	

Add the throughput, throughput type, throughput origin, and throughput comment. Then, click the orange Save button.

Edit Throu	ıghput Inforr	natio	n - Other I	Proces	ses	×		
AER Device ID	Permit Device ID	A/N	Process ID	Rule #	Activity	scc		
ES7			Ρl	405	Metals and Alloys : Fabricated : Machining Operations : Arc Welding: General			
				Annua	l Throughput			
Annual Thro	ughput	2.0000	* hour 🗙 *					
Throughput	Туре	Input V *						
Throughput Origin		Direct	<b>▼</b> *					
Throughput Comment Logi			ok					
					Save Cance	1		

# Click on the orange Add New button in Step 3

Oth	er Processe	es								
This repo Step inte avo	reporting screens. of 1 may cause rmal combustic id double report	en is for i Please pr <b>data in t</b> l on process rting. Det	reportin ovide s he follo catego ailed in	ng ac peci owing ories strue	ctivity data fic informa <b>g steps to</b> . Combine ctions are	a for of ation fo <b>reset.</b> d emis availat	ther processes use or every associate Combustion emis sions can also be r ole by clicking on 1	ed in your facility w d emission source. sions need to be re reported here; how Help icon in the too	hich were not covere <b>Please start with Ste</b> ported separately un- ever, it must be subst ol bar.	d in previous <b>p 1, edits to</b> der external or cantiated to
Step	1: Process								Optional: N	lark as Completed
	AER Device ID	Permit De	vice ID	A/N	Process ID	Rule #		Activ	rity	SCC
Open	ES11				P2	404	Metals and Alloys : Fa	bricated : Machining Ope	rations : Other Not Classifie	d
							Annual Throughp	out		
Open							2.00000000 hou	ır		
Step	3: Criteria Em	issions (lt	os)						Use Default Emission	Factors if available.
	Pollutant	EF	Unit		Contr	rolled EF	EF	F Data Source	Overall CE	Emissions
Ad	d New									
Step	4: Toxic (TAC/	ODC) Emi	ssions	(lbs)					Use Default Emission	Factors if available.
	TAC/ODC	Group	CAS	#	EF Uni	t	Controlled EF	EF Data Source	Overall CE	Emissions
Ad	d New									

Choose PM as the pollutant, and the emission factor, and chose AP-42 for the emission factor data source. Then click the orange Save button.

Open Crit	eria Emission	Info	rmation -	Other	Processes	×			
AER Device ID	Permit Device ID	A/N	A/N Process Rule Activity		Activity	scc			
ES7			Pl	405	Metals and Alloys : Fabricated : Machining Operations : Arc Welding: General				
				Annual	Throughput				
Pollutant Emission Fa	ictor (EF)	PM 6.06	× * 000000e-1	L	* lbs/				
		0 C	ontrolled E	F value	ted represents EF determined after control)				
Overall Con	trol Efficiency								
Emission Fa	ctor Comment								
		If not refer with Proce	t using AQ ences in th the inform esses witho	MD de e Emis ation. out this	fault emission factor please provide detailed sion Factor Comment box above or upload file information are subject to audit.				
Emission Fa	ctor Data Source	AP-4	2		* (~				
Emissions		0.0000000e+0 lbs							
					Save Cance	1			

Repeat this process for NOx. Click on the orange Add New button in Step 4

#### **Other Processes**

This reporting screen is for reporting activity data for other processes used in your facility which were not covered in previous reporting screens. Please provide specific information for every associated emission source. Please start with Step 1, edits to Step 1 may cause data in the following steps to reset. Combustion emissions need to be reported separately under external or internal combustion process categories. Combined emissions can also be reported here; however, it must be substantiated to avoid double reporting. Detailed instructions are available by clicking on Help icon in the tool bar.

Step	1: Process					Optional: Mark as Comple	eted
	AER Device ID	Permit Device ID	A/N	Process ID	Rule #	Activity	SCC
Open	ES11			P2	404	Metals and Alloys : Fabricated : Machining Operations : Other Not Classified	
						Click here to <u>delete</u> this pro-	cess.

#### Step 2: Throughput

					Annual Through	iput					
<u>Open</u> 2.0000000 hour											
Step 3	: Criteria Em	issions (lbs)					Use <u>Default Emis</u>	sion Factors if available.			
	Pollutant	EF		Unit	Controlled EF	EF Data Source	Overall CE	Emissions			
<u>Open</u>	PM	6.0600000e-1	lbs / ho	our	No	AP-42		1.21200000e+0			
<u>Open</u>	NOx	1.3200000e+0	lbs / ho	our	No	AP-42		2.6400000e+0			
Add	New										
Step 4	: Toxic (TAC/	ODC) Emissions (lbs)					Use <u>Default Emis</u>	sion Factors if available.			
	TAC/ODC	Group CAS #	EF	Unit	Controlled EF	EF Data Source	Overall C	E Emissions			
Add	New										

Choose Manganese, enter the emission factor and choose AP-42 for the emission factor data source.

ER Device	Permit Device ID	A/N	Process	Rule #	Activity	SC			
511	1078		P2	404	Metals and Alloys : Fabricated : Machining Operations : Other Not Classified				
				Annua	l Throughput				
				2.000	00000 hour				
TAC/ODC T	oxic Pollutants / O	zone De	epleting Com	pounds					
Pollutant		49 -	Mangane	se	*				
					* ]				
TAC Group		49 -	Manganes	e					
CAS # (Pol	lutant)	7439	965 - Man	ganese	2				
Emission Fa	actor (EF)	2.6600000e-2 * lbs/hour							
		C (r	ontrolled I	EF valu x if EF li	e sted represents EF determined after control)				
Overall Cor	ntrol Efficiency								
Emission Fa	actor Comment								
		If not refer with Proce	t using <b>AQ</b> ences in th the inform esses with	MD de ne Emis nation. out this	fault emission factor please provide detailed ssion Factor Comment box above or upload file s information are subject to audit.				
Emission Fa	actor Data Source	AP-4	2		♥ *				
Emissions		5.32	000000e-2	lbs					

Repeat for the other TAC emissions.

Plasma/Laser Cutting of Metal