




MEMORANDUM

TO: Community Advisory Council Members

FROM: Doug Grapple 

DATE: July 27, 2011

SUBJECT: Proposed Amendments to Rules 102, 202, 330, 337, 349, and 353

Enclosed please find a Background Paper on amendments to Rules 102, 202, 330, 337, 349, and 353. The proposed amended rules (PARs) are within Appendices A -F of the Background Paper. We plan to ask the APCD Board of Directors to consider adopting the amended rules on October 20, 2011.

The amended rules include new or amended solvent cleaning provisions, which were modeled on requirements added to Rule 321, Solvent Cleaning Machines and Solvent Cleaning, in September 2010. These provisions include use of low emission materials, methods, and operating procedures.

Amended Rules 330, 349, and 353 will limit the cleaning solvent reactive organic compound content to 25 grams per liter. Rule 337 coating categories and limits are being changed to reflect those found in a U.S. Environmental Protection Agency (USEPA) Control Techniques Guideline document or other California air district rules.

Changes to other rule provisions (e.g., exemptions, recordkeeping, coating limits, and polyester resin monomer content limits) are also proposed to address comments from California Air Resources Board (ARB), USEPA, and industry representatives. In conjunction with the rule changes noted above, amended Rule 102 and Rule 202 will be considered for adoption.

On July 7, the District made a draft Background Paper on this project available for public review. The only significant changes we made to the July 7th draft rules are:

1. Modify PAR 330.B.5 to clarify that the associated solvent cleaning operations are subject to the rule,
2. Revise 330.B.10 to clarify solvent cleaning provisions do not apply when using the listed coatings, and
3. Add lower ROC-content limits to three coatings in Rule 337 (adhesion promoter, antichafe coating, and fastener sealant).

These changes were made in response to comments from ARB and industry. The District is proposing that the lower Rule 337 coating limits go into effect 24 months after the date of rule adoption.

Staff intend to explain any additional changes that have been made at the August 10 CAC meeting.