

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**



P.O. Box 2815
Sacramento, California 95812

April 11, 2012

ARB Staff Rule Review Results

To: Douglas Grapple, Air Quality Engineer
Santa Barbara County Air Pollution Control District
Telephone Number: (805) 961-8883
e-mail: grappled@sbcapcd.org

From: Patrick Au, (916) 322-3303
e-mail: pau@arb.ca.gov

The following rules, which are scheduled for a public workshop to be held by your District staff on April 11, 2012, were received by us on March 8, 2012, for our review:

Rule 102	Definitions
Rule 202	Exemptions to Rule 201
Rule 321	Solvent Cleaning Machines and Solvent Cleaning
Rule 330	Surface Coating of Metal Parts and Products
Rule 337	Aerospace Vehicles and Components
Rule 349	Polyester Resin Operations
Rule 353	Adhesives and Sealants

The Air Resources Board staff has reviewed the rules and, based on the information available to us at this time, we have no comments. The rules were examined by the Enforcement Division, and by the Stationary Source Division.

If you have any questions, please contact me by e-mail or at the telephone number above.

Douglas F. Grapple

From: Andrew Steckel <Steckel.Andrew@epamail.epa.gov>
Sent: Friday, March 23, 2012 9:22 AM
To: Douglas F. Grapple; mguzzett@arb.ca.gov
Cc: Adrienne Borgia; Sally Grady
Subject: EPA comments on Santa Barbara VOC rules



United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 23, 2012

Transmittal of EPA Rule Review Comments

To: Doug Grapple, Santa Barbara County Air Pollution Control District
grappled@sbcapcd.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: SBCAPCD Rules 321, 330, 337, 349 and 353, draft dated March 8, 2012

Thank you for providing draft versions of these rules for our review. We are providing comments based on our preliminary review. Please direct any questions about our comments to me at (415) 947-4115 or to Adrienne Borgia at (415) 972-3576.

Rule 321

Rule 321 was last approved by the EPA on September 29, 2011 (76 FR 60376). Our Technical Support Document (TSD) associated with this approval had several recommendations to further improve the rule:

1. Consider reducing the solvent ROC limit to 25 grams/liter in the following subsections: B-13, B-15, G-3, H-7, I-7, J-11, K-6, L-11, M-2 and M-3 consistent with analogous rules in South Coast AQMD, San Joaquin Valley APCD and elsewhere.
2. Consider reducing other limits in Section M, Table 1 consistent with CARB recommendations, South Coast Rules 1171 and 1124, and San Joaquin Rule 4663:

Solvent and Cleaning Activity	ROC Limit	
	From	To
	g/l (lb/gal)	g/l (lb/gal)
(a) Product Cleaning During Manufacturing...		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components...	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals	900 (7.51)	800 (6.7)
(b) Repair Cleaning and Maintenance Cleaning		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components...	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals:		
(I) Tools, Equipment, & Machinery	900 (7.51)	800 (6.7)
(II) General Work Surfaces	900 (7.51)	600 (5.0)

- (c) Cleaning of Coatings Application Equipment 950 (7.51) 25 (0.21)
(d) Cleaning of the Following Items... 900 (7.51) 200 (1.68)

3. Change the phrase in subsection M-2 from "50 grams per liter of material..." to "50 grams of reactive organic compound per liter..." Also, subsection M-2-a would be more complete if the requirement to store wipes in containers was added.

4. The following revisions to Section P should be incorporated to support rule enforceability:

- a. Subsection 5: Method 2G is in 40 CFR, Part 60, Appendix A-2.
- b. Subsection 8: Method 18 is in 40 CFR, Part 60, Appendix A-6.
- c. Add reference 40 CFR Part 60, Appendix A-7, to Methods 25 and 25A indicated in subsection 8.
- d. The EPA approved version of ASTM E169, referenced in subsection 7, is 1993. For consistency, indicate as ASTM E169-93 (2004).

Rule 330

All our recommendations to a previous draft of this rule were incorporated. The following are additional comments.

1. Please be consistent when you delete definitions in Section C that are in Rule 102. In some cases, the defined word is just removed; in other cases, the word remains but "as defined in Rule 102, Definitions," is added.
2. The Recordkeeping requirements in Section H-5 indicate that monthly usage records are acceptable. Per EPA's Little Blue Book (April 21, 2001) page 11, please require daily usage records unless the stationary source is not subject to limits (by any applicable District rules or permits) and only materials compliant with Section D are being used or the exemption in subsection B,1 is being claimed.

Rule 337

All recommendations to a previous draft of this rule were incorporated. The following are additional comments.

1. In Section C, consider being more consistent when you delete definitions that are in Rule 102. In some cases, the defined word is just removed; in other cases, the word remains but "as defined in Rule 102, Definitions," is added.
2. The Recordkeeping requirements in Section H,4 indicate that monthly usage records are acceptable. Per EPA's Little Blue Book (April 21, 2001) page 11, please require daily usage records unless the stationary source is not subject to limits (by any applicable District rules or permits) and only materials compliant with Section D are being used or the exemption in subsection B,1 is being claimed.

3.

Rule 349

1. The Recordkeeping requirements in Section F,2 indicate that monthly usage records are acceptable. Per EPA's Little Blue Book (April 21, 2001) page 11, please require daily usage records unless the stationary source is not subject to limits (by any applicable District rules or permits) and only materials compliant with Section D are being used or the exemption in subsection B,1 is being claimed.
2. Generally when claiming an exemption such as the one in subsection B,1, the district requires daily usage recordkeeping. Please revise Section B,1 and F,6 to require daily recordkeeping.

Rule 353

Generally our previous recommendations were incorporated. However, some of these revisions were made in the July 7, 2011 version of rule 353 but have since been rescinded. The following are repeated or additional comments.

1. Consider revising the exemption for cyanoacrylate in subsection B,7 to include provisions for work practices, such as storing and handling.

2. Consider decreasing the maximum size of adhesive containers to 16 fluid ounces in subsections B,8 and B,10,c,1 and 2.
 3. In Section C, please make the following corrections:
 - a. There are two definitions for Adhesive Primer. We suggest the first one, consistent with SCAQMD Rule 1168.
 - b. Correct the formulas in the definitions for "Grams of Reactant Organic Compound per Liter of Adhesive or Sealant Less Water and Less Exempt Compounds" and "Percent Reactive Organic Compound by Weight."
 - c. Please be consistent when you delete definitions that are in Rule 102. In some cases, the defined word is just removed; in other cases, the word remains but "as defined in Rule 102, Definitions," is added.
 - d. Add definitions for "Catalytic Incinerator" and "Carbon Adsorber" used in Section I.
 4. In Section D, consider using the following limits in tables 353-1 and 353-2 consistent with SCAQMD Rule 1168:
 - a. Multipurpose construction adhesive: 70 grams/liter
 - b. Other plastic cement welding: 250 grams/liter
 - c. Adhesives and sealants for fiberglass: 80 grams/liter
 - d. Adhesives and sealants for porous materials: 50 grams/liter
 5. The recordkeeping requirements in Section O indicate that monthly usage records are acceptable. Per EPA's Little Blue Book (April 21, 2001) page 11, please require daily usage records unless the stationary source is not subject to limits (by any applicable District rules or permits) and only materials compliant with Section D are being used or the exemption in subsection B,9 is being claimed.
 6. In subsection Q,9 revise the reference from Q.11 to Q.10.
-

Douglas F. Grapple

From: Ron L. Tan
Sent: Tuesday, August 16, 2011 9:10 AM
To: Douglas F. Grapple; Brian P. Shafritz
Subject: EPA and Rule 353

Spoke to Adrienne Borgia of Region IX this morning

1. We can keep the 16 ounce minimum container size.
2. Except for Title V and MACT, 2 years of recordkeeping retention is sufficient. For Title V and MACT, 5 years is the retention time

Ron Tan
Planning and Technology Supervisor
Santa Barbara County APCD
805.961.8812
fax: 805.961.8801
e-mail: rtan@sbcapcd.org

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**



P.O. Box 2815
Sacramento, California 95812

August 8, 2011

ARB Staff Rule Review Results

To: Douglas Grapple, Air Quality Engineer
Santa Barbara County Air Pollution Control District
Telephone Number: (805) 961-8883
e-mail: grappled@sbcapcd.org

From: Patrick Au, (916) 322-3303
e-mail: pau@arb.ca.gov

The following rules, which are scheduled for a public workshop to be held by your District staff on October 10, 2011, were received by us on July 7, 2011, for our review:

Rule 102	Definitions
Rule 202	Exemptions to Rule 201
Rule 330	Surface Coating of Metal Parts and Products
Rule 337	Aerospace Vehicles and Components
Rule 349	Polyester Resin Operations
Rule 353	Adhesives and Sealants

The Air Resources Board (ARB) staff has reviewed the rules and, based on the information available to us at this time, we have no comments. The rules were examined by the following ARB divisions: Enforcement, Monitoring and Laboratory, and Stationary Source.

We appreciate that your staff addressed our concerns with proposed draft amended Rule 349 and incorporated our suggested changes in the July 7, 2011, version. ARB staff considers the proposed amendments to Rule 349 acceptable and meet state RACT/BARCT requirements for your District.

If you have any questions, please contact me by e-mail or at the telephone number above.

Douglas F. Grapple

From: Au, Patrick@ARB <pau@arb.ca.gov>
Sent: Monday, July 11, 2011 11:06 AM
To: Douglas F. Grapple
Subject: Rule Review Results
Attachments: SB 102 202 330 337 349 353 d Cmt Ltr 7-11-11.pdf

Hi Doug,

Attached are results of ARB staff review of your District's rules. The comment letter is regard to the first draft we received on June 13, 2011. The 2nd draft of these rules you sent to me on 7/7/11 are currently processing for review. As far as the 2nd draft Rule 349 goes, Ron Hand had reviewed it and satisfied with the changes. A follow-up letter will be sent to you to acknowledge the satisfaction of the revised draft Rule 349 as well as results of our review of the other rules. Please let me know if you have questions. Thanks.

Pat

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**



P.O. Box 2815
Sacramento, California 95812

July 11, 2011

**Transmittal
of
ARB Staff Rule Review Comments**

To: Douglas Grapple, Air Quality Engineer
Santa Barbara County Air Pollution Control District
Telephone Number: (805) 961-8883
e-mail: grappled@sbcapcd.org

From: Patrick Au, (916) 322-3303
e-mail: pau@arb.ca.gov

The following rules, which you requested for our review and comment, were received by us on June 13, 2011:

Rule 102	Definitions
Rule 202	Exemptions to Rule 201
Rule 330	Surface Coating of Metal Parts and Products
Rule 337	Aerospace Vehicles and Components
Rule 349	Polyester Resin Operations
Rule 353	Adhesives and Sealants

The Air Resources Board (ARB) staff has reviewed the rules and we have the enclosed comments on Rules 337 and 349 on the following pages. We believe that our comments are important to the clarity, effectiveness, and enforceability of the rules, specifically Rule 349.

Our review of Rule 349 concluded that ARB cannot support the rule in its current proposed form because it does not meet ARB's reasonably available control technology/best available retrofit control technology (RACT/BARCT) requirements for polyester resin operations in your District. ARB's RACT/BARCT determination is based on a comparison of the compliant materials volatile organic compound content and emissions control system limits/requirements in San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) Rule 4684, South Coast Air Quality Management District (SCAQMD) Rule 1162, and Ventura County Air Pollution Control District (VCAPCD) Rule 74.14. We ask that the District modify Rule 349 consistent with our recommendations to bring Rule 349 in meeting RACT/BARCT requirements. Mr. Ron Hand of our Technical Analysis Section, Emissions Assessment Branch, Stationary Source Division, discussed our comments with you on June 22 and June 23, 2011. Mr. Hand indicated that the District would incorporate our recommendations.

If you have any questions about our comments on Rule 349, please call Ms. Peggy Taricco, Manager of the Technical Analysis Section, at (916) 323-4882.

We also ask that the District incorporate our comments on Rule 337. This would make Rule 337 more consistent with SJVUAPCD Rule 4605, SCAQMD Rule 1124, and VCAPCD Rule 74.13. It would also provide the District with increased emission reduction benefits. Mr. Minh Pham of our Technical Development Section, Consumer Products and New Strategies Branch, Planning and Technical Support Division, discussed our comments with you on June 23, 2011. If you have any questions about our comments on Rule 337, please contact Mr. Jose Gomez, manager of the Technical Development Section, at (916) 324-8033.

Thank you for involving the Air Resources Board staff in your rule development process.

Rule review comments are on the following pages

Air Resources Board Staff Comments on
Santa Barbara County Air Pollution Control District
Draft Rules 102, 202, 330, 337, 349, and 353

Rule 102 Definitions

We have no comment on this rule.

Rule 202 Exemptions to Rule 201

We have no comment on this rule.

Rule 330 Surface Coating of Metal Parts and Products

We have no comment on this rule.

Rule 337 Aerospace Vehicles and Components

Section D.1.

We recommend that the District revise the volatile organic compound (VOC) limits for the categories listed below (Table 337-2)

Table 337-2: Reactive Organic Compound (ROC) Content Limits for Specialty Coating

Coating Type	ROC Limits	
	g/L	Lbs/gal
Adhesion Promoter	250	2.1
Antichafe Coating	420	3.5
Fastener Sealant	600	5

Section D.2.a.

We recommend revising the maximum limit of an applied stripper to 300 grams per liter rather than the proposed 400 grams per liter. Lowering this limit would bring this category limit in line with San Joaquin Valley APCD and Ventura County APCD limits.

Rule 349 Polyester Resin Operations

Section D.1.a&b: These sections allow the use of polyester resin materials with an ROC monomer content (percentage) greater than what we consider compliant with our RACT/BARCT determination. We suggest including the applicable materials (resin & gel coat) and corresponding weight percent required in the recently adopted (June 16, 2011) SJUVAPCD Rule 4684, section 5, table 1. We also suggest inserting a table similar to the format of table 1 in the proposed rule for readability.

Section D.1.c: This section allows the use of a resin containing a vapor suppressant such that weight loss from ROC emissions does not exceed 60 grams per square meter . . . This limit does not meet RACT/BARCT and should be reduced to a VOC weight loss limit not to exceed 50 grams per square meter.

Section D.1.e: This section establishes the overall control efficiency of the approved emission control system to “. . . at least 85% by weight . . . “ To meet RACT/BARCT, the overall control efficiency should be increased to “at least 90%.”

- a. Our suggested amendment in Section D.1.e. requires the percent reduction by weight specified in subsections D.1.e.i (control device) and D.1.e.ii (capture system) of 92.2 % both increased to 95%. This amendment is necessary to ensure the approved emission control system will realize a 90% overall emission control efficiency.

Rule 353 Adhesives and Sealants

We have no comment on this rule.

Douglas F. Grapple

From: Stanley Tong <Tong.Stanley@epamail.epa.gov>
Sent: Wednesday, July 06, 2011 3:25 PM
To: Brian P. Shafritz
Cc: Andrew Steckel; Douglas F. Grapple; Adrienne Borgia
Subject: RE: Test Methods

Brian,

We're okay with using the highlighted text for EPA test methods.

Stan

Stanley Tong
U.S. EPA Region IX
Rules Office (AIR-4)
75 Hawthorne St.
San Francisco, CA 94105

415-947-4122 -voice
415-947-3579 -fax

From: "Brian P. Shafritz" <ShafritzB@sbcapcd.org>
To: Stanley Tong/R9/USEPA/US@EPA, Andrew Steckel/R9/USEPA/US@EPA
Cc: "Douglas F. Grapple" <GrappleD@sbcapcd.org>
Date: 07/06/2011 01:23 PM
Subject: RE: Test Methods

Gents, so would EPA have any problem if we used identical text (see yellow highlight) for EPA methods? Since we have not dated EPA methods in our rules (like most APCDs) this would build in the flexibility within the rule itself to use the latest version of an approved method.

Brian

From: Stanley Tong [<mailto:Tong.Stanley@epamail.epa.gov>]
Sent: Wednesday, July 06, 2011 12:46 PM
To: Brian P. Shafritz
Cc: Adrienne Borgia
Subject: Re: Test Methods

Brian,

This is the language I remember:

SanJoaquin R4622 - **RULE 4622 GASOLINE TRANSFER INTO MOTOR VEHICLE FUEL TANKS**

6.5 Test Methods

6.5.1 Tests shall be conducted in accordance with the latest version of the following ARB and EPA approved test methods, or their equivalents as

approved by the EPA, and the APCO.

<http://www.arb.ca.gov/drdb/sju/curhtml/r4622.pdf>

or SJV4624 Transfer of Organic Liquid

6.3.5 The latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA, shall be used to determine the TVP of crude oil with an API gravity of 26 degrees or less, or for any API gravity that is specified in this test method. <http://www.arb.ca.gov/drdb/sju/curhtml/r4624.pdf>

Stan

Stanley Tong
U.S. EPA Region IX
Rules Office (AIR-4)
75 Hawthorne St.
San Francisco, CA 94105

415-947-4122 -voice
415-947-3579 -fax

From: Andrew Steckel/R9/USEPA/US
To: Stanley Tong/R9/USEPA/US@EPA
Cc: Adrienne Borgia/R9/USEPA/US@EPA
Date: 07/06/2011 11:09 AM
Subject: Re: Test Methods

Stan - I just picked up this message. I expect it's in response to a comment letter Adrienne sent yesterday on three SB rules. Would you reply?

From: "Brian P. Shafritz" <ShafritzB@sbcapcd.org>
To: Andrew Steckel/R9/USEPA/US@EPA
Cc: "Douglas F. Grapple" <GrappleD@sbcapcd.org>
Date: 07/06/2011 09:02 AM
Subject: Test Methods

Hi Andy,

Do you have time today around 11 AM today to talk with Doug Grapple and myself on EPA approved test methods and dates, future updates of methods, and ideas on rule language to handle this?

Brian

Brian Shafritz

Brian Shafritz
Santa Barbara County Air Pollution Control District
(805) 961-8823
Shafritzb@sbcapcd.org

Douglas F. Grapple

From: Stanley Tong <Tong.Stanley@epamail.epa.gov>
Sent: Wednesday, July 06, 2011 1:23 PM
To: Douglas F. Grapple; Brian P. Shafritz
Cc: Andrew Steckel; Adrienne Borgia
Subject: Re: FW: Test Methods

Doug,

Here are the latest ones we've approved. Generally, the ASTMs in 40 CFR 60.17 can be cited.

ASTM E260-96(2006), "Standard Practice for Packed Column Gas Chromatography," ASTM International

ASTM D2369-95, "Standard Test Method for Volatile Content of Coatings," ASTM International

ASTM D 1084-88, "Standard Test Methods for Viscosity of Adhesives," ASTM International

Stan

From: Andrew Steckel/R9/USEPA/US
To: "Douglas F. Grapple" <GrappleD@sbcapcd.org>, Stanley Tong/R9/USEPA/US@EPA
Cc: "Brian P. Shafritz" <ShafritzB@sbcapcd.org>
Date: 07/06/2011 12:46 PM
Subject: Re: FW: Test Methods

Brian - Sorry I didn't pick up your request til after 11:00, but Stan or I (although Stan knows this better) could talk another time if you still want.

Stan - Can you reply on Doug's message?

From: "Douglas F. Grapple" <GrappleD@sbcapcd.org>
To: "Brian P. Shafritz" <ShafritzB@sbcapcd.org>
Cc: Andrew Steckel/R9/USEPA/US@EPA
Date: 07/06/2011 12:23 PM
Subject: FW: Test Methods

Need the EPA approval dates for the following:

ASTM E260, "Standard Practice for Packed Column Gas Chromatography," ASTM International

ASTM D2369, "Standard Test Method for Volatile Content of Coatings," ASTM International

ASTM D 1084, "Standard Test Methods for Viscosity of Adhesives," ASTM International

Douglas Grapple
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
Phone: 805.961.8883
grappled@sbcapcd.org

From: Brian P. Shafritz
Sent: Wednesday, July 06, 2011 8:56 AM
To: steckel.andrew@epa.gov
Cc: Douglas F. Grapple
Subject: Test Methods

Hi Andy,

Do you have time today around 11 AM today to talk with Doug Grapple and myself on EPA approved test methods and dates, future updates of methods, and ideas on rule language to handle this?

Brian

Brian Shafritz

Brian Shafritz
Santa Barbara County Air Pollution Control District
(805) 961-8823
Shafritzb@sbcapcd.org

Douglas F. Grapple

From: Andrew Steckel <Steckel.Andrew@epamail.epa.gov>
Sent: Tuesday, July 05, 2011 3:05 PM
To: Douglas F. Grapple; mguzzett@arb.ca.gov
Cc: Adrienne Borgia
Subject: EPA comments on SB 330, 337 & 353



United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 05, 2011

Transmittal of EPA Rule Review Comments

To: Doug Grapple, Santa Barbara County Air Pollution Control District
grappled@sbcapcd.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: Santa Barbara Rule 330; Rule 337; Rule 353, draft dated June 10, 2011

Thank you for providing draft versions of these rules for our review. We are providing comments based on our preliminary review of the draft rules identified above. Please direct any questions about our comments to me at (415) 947-4115(415) 947-4115 or to Adrienne Borgia at (415) 972-3576.

Rule 330:

1. Please revise section B-2 which fully exempts touch-up and repair operations. The Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, EPA-453/R-08-003, September 2008, recommends that the VOC limits and work practices apply to touch-up coatings, repair coatings and textured finishes.
2. All coatings, application methods and control methods indicated in the rule should be defined. Please include definitions for: Reactive Organic Compound (may refer to Rule 102), Non-Powder Coating, Powder Coating, Thermal Incinerator, Catalytic Incinerator, Carbon Adsorber, Stationary Sources, Flow Coat Application and Dip-coat Application.
3. To comply with the guidance of the Little Bluebook for enforceability issues, we recommend that EPA-approved dates be provided for the following test methods listed in section I-1.: ASTM D4457 - 1991 and SCAQMD Method 313-91, June 1993. Similarly, for those test methods listed in section I-2: CARB Method 100, June 28, 1997, SCAQMD Method 25.3, March 2000 and CARB Method 422, September 1990.
4. The statement in section I-4 may also compromise enforceability as the referenced section E-8 indicates "any other application method" and the test method recommended in section I-4 is only for determining the transfer efficiency of spray equipment.

Rule 337:

1. The definition of self-priming topcoat is vague and may be misinterpreted. Since this category has been removed from the VOC limits table, consider deleting this definition.
2. The CTG for Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations, EPA-453/R-97-004, December 1997, has not included a category limit for Sealant Bonding Primer. Please explain the

basis for the VOC limit in the staff report or apply the default CTG limit to this category.

3. In subsection D-2-a, the required stripper ROC level is 400 grams/liter with a composite pressure of 10 mm. Consider a lower limit of 300 grams/liter with a composite partial pressure of 45 mm which both SJVUAPCD and VCAPCD have adopted.

4. The non-EPA VOC test methods listed in subsection I-1 should include the complete title of the test method and the date of the EPA-approved version. The EPA approved version of ASTM D 4457 is 1991 and SCAQMD Test Method 313-91 should be dated June 1993. Similarly SCAQMD methods 25.1 and 25.3 and CARB method 18 listed in subsection I-2 should include the dates February 1991, March 2000 and September 12, 1990 respectively. The EPA approved version of the SCAQMD protocol "CE" indicated in subsection I-3-b is May 1995 and that of the test procedure "TE" in subsection I-4 is May 1989. Finally, the 1997 version of ASTM D 2879, referred to in subsection I-5, is the latest version of approved by EPA.

5. Subsection I-6 addresses the determination of emissions that are not ROC but includes (in subsection c) a determination of overall efficiency of ROC and/or toxic air emissions. Similarly, Subsection I-7 addresses capture efficiency of emissions that are not ROC but uses methods for quantifying ROC and/or toxic air contaminants. Please verify that these determinations will only quantify non-ROC toxic emissions. The vague language of subsections I-6 and I-7 undermines the enforceability of this rule. We recommend siting more specific determinations of control device efficiency and capture efficiency tests and clarifying how existing tests must be modified to obtain results for non-ROC toxic emissions.

6. References to EPA test methods in section I are not consistent. In some cases the CFR reference is used and in other cases it is not. Please consider a uniform method of referencing EPA methods.

Rule 353:

1. Please correct these typos:

- a. In subsection B-3, replace "quality" with "qualify."
- b. In subsection B-11-b, insert the word "or" between "adhesive product (including aerosol adhesive)" and "sealant product".
- c. In definitions (Section C), change the word "means" to "is in the the definition of "Tire Retread Adhesive".

2. Subsection B-5 seems vague and difficult to enforce. The District, not the user, should determine if there is no complying adhesive for the laminating equipment installed prior to July 1992. This also implies that old laminating equipment recently installed could use complying adhesives. Should this be tied to the date of manufacture of the equipment rather than to the installation date?

3. SJVUAPCD Rule 4653 also exempts Cyannoacrylate adhesives but retains these adhesives in the "work practices" section. Please consider adding the provision of work practices to this exemption in subsection B-8.

4. SJVUAPCD also limits the adhesive amounts exempt from the VOC limits of the rule and from prohibition of sale to 8 fluid ounces. Consider reducing the minimum container from 16 to 8 fluid ounces.

5. While the Adhesive ROC limits closely resemble those in the "CARB Determination of RACT and BARCT for Adhesives and Sealants" (December 1998), there was one exception. The metal to urethane molding or casting adhesive limit in the CARB document was lowered to 250 g/l in 2001. Please reduce this limit to 250 g/l.

6. Please also be aware that the limit for PVC welding in the CTG for Miscellaneous Industrial Adhesives, EPA-453/R-08-005, September 2008, is 500 g/l.

7. Consider expanding the definition of "Aerosol Adhesive" in Section C, similar to the definition in AVAQMD's Rule 1168.

8. Several of the comments made for Rule 337 regarding test methods apply to this rule as well. Refer to items 4,5 and 6 of Rule 337 comments above. In addition the following revisions are recommended:

- a. In subsection N-3, SCAQMD test method 305-91, June 1993 is the EPA approved version. In addition CARB test method 310 was last approved by EPA on June 22, 2000.
- b. In subsection N-4 and N-4, the SCAQMD Method 316A should be dated October 1996.

Douglas F. Grapple

From: Hand, Ronald@ARB <rhand@arb.ca.gov>
Sent: Thursday, June 30, 2011 12:45 PM
To: Douglas F. Grapple
Cc: Ron L. Tan; Brian P. Shafritz
Subject: RE: Draft Rule 349

Douglas and Brian,

Understood. But, as mentioned yesterday regarding potential roadblocks, if you emphasize our point that for Draft Rule 349 to meet RACT/BARCT for your District our suggested rule amendments are necessary. Hopefully this, including a compliance window) will sway any potential hesitancy to agree. Another point I mentioned to consider is the availability of complying monomers. It may be that the only polyester resin materials available are ones with monomer contents that comply with the new limits. Then the only issue may be to provide a future implementation date that allows the affected source to use its remaining stock of materials.

Regards,
Ron

From: Douglas F. Grapple [<mailto:GrappleD@sbcapcd.org>]
Sent: Thursday, June 30, 2011 12:24 PM
To: Hand, Ronald@ARB
Cc: Ron L. Tan; Brian P. Shafritz
Subject: FW: Draft Rule 349

From: Brian P. Shafritz
Sent: Thursday, June 30, 2011 12:20 PM
To: rhand@arb.ca.gov
Cc: Douglas F. Grapple
Subject: Draft Rule 349

Ron, thanks for your email comments attached.

Please note that a major part of our discussion yesterday was to let you know that the main focus of the Rule 349 control measure committed to in the Clean Air Plan adopted by our Board in January 2011 (upon recommendation from our Community Advisory Council) were ROC reductions based on new solvent cleaning provisions. Thus when we take this draft rule back to the Community Advisory Council next month, we could run into roadblocks with the CARB recommended path of 90% control that will impact coating limits. The main point we were making to you yesterday was that if we run into major hurdles (even with a 18-24 month compliance window), we may need to reconsider this additional component. We will keep you posted on any hurdles we run into, and how we intend to handle them.

Thanks,
Brian

Brian Shafritz

Brian Shafritz

Santa Barbara County Air Pollution Control District
(805) 961-8823
Shafritz@sbcapcd.org

Douglas F. Grapple

From: Hand, Ronald@ARB <rhand@arb.ca.gov>
Sent: Thursday, June 30, 2011 10:52 AM
To: Douglas F. Grapple
Cc: Taricco, Peggy@ARB; Au, Patrick@ARB
Subject: ARB comments on Rule 349
Attachments: EMAIL COMMENTS_SB_Rule 349_rkh_6_30_11.docx

Doug,

I've attached our informal comments, which will be sent to your District formally through our Rules section from Patrick Au. We appreciate the District's intent to move forward with our recommended amendments to Rule 349.

Regards,
Ron Hand

EMAIL COMMENTS TO SANTA BARBARA APCD

RULE 349 AMENDMENTS:

Douglas Grapple:

The following determinations/recommendations pertain to the current and proposed amendments to Rule 349 -Polyester Resins Operations. For the record I have discussed our concerns and recommendations with Mr. Grapple on June 22nd and 23rd, 2011. In addition, a conference call was conducted with Mr. Grapple, and Mr. Brian Shafritz, Manager, Technology and Assessment, on May 30, 2011 to further discuss the following recommendations. The call concluded with District staff agreeing to proceed with our recommended amendments in their rule development process. Mr. Shafritz expressed a potential need to delay implementation of the proposed changes based on feedback from certain community stakeholders. ARB and district staff agreed if necessary a delay from 18-24 months may be appropriate, depending on the issues raised by the stakeholders.

Briefly, ARB staff believes additional amendments are needed to ensure the proposed amended Rule 349 meets RACT/BARCT for your district. Our RACT/BARCT determination is based on a comparison of the compliant materials VOC content and emissions control system limits/requirements in San Joaquin Valley APCD, Rule 4684 (recently amended 6/16/2011), South Coast AQMD, Rule 1162, and Ventura County APCD, Rule 47.14

ARB staff recommend the following changes to section D Requirements be included to meet RACT/BARCT for polyester resins operations in your District.

1. Section D.1.a&b: These sections allow the use of polyester resin materials with ROC monomer content (percentage) greater than what we consider compliant with our RACT/BARCT determination. We suggest including the applicable materials (resin & gel coat) and corresponding weight percent required in the recently adopted (June 16, 2011) SJV Rule 4684, section 5, table 1. We also suggest inserting a table similar to the format of table 1 in the proposed rule for readability.
2. Section D.1.c: This section allows a resin containing a vapor suppressant a weight loss from ROC emissions does not exceed 60 grams per square meter . . . This limit does not meet RACT/BART and should be reduced to a VOC weight loss limit not to exceed 50 grams per square meter.

3. Section D.1.e: This section establishes the overall control efficiency of the approved emission control system to “. . . at least 85% by weight . . . “ To meet RACT/BART the overall control efficiency should be increased to “at least 90%.”
 - a. Our suggested amendment in number 3 requires the percent reduction by weight specified in subsections D.1.e.i (control device) and D.1.e.ii (capture system) of 92.2 % both increased to 95%. This amendment is necessary to ensure the approved emission control system will realize a 90% overall emission control efficiency.

The Rules section of ARB will submit a formal letter to the District detailing our concerns and suggested changes for Rule 349 and the proposed amendments.

Douglas F. Grapple

From: Pham, Minh@ARB <mhpham@arb.ca.gov>
Sent: Monday, June 27, 2011 2:09 PM
To: Douglas F. Grapple
Subject: RE: Outline of Our Discussions on Thursday June 23

Hi Douglas,

I would like to thank you for your time and consideration of our comments. We view our comments as rule improvements and encourage that you consider them as the rule currently moves along for SIP submittal. However, if this cannot be addressed at this time, we recommend that you revisit these comments and consider their incorporation when the rule is reopened for amendments.

Regards,

Minh H. Pham

Air Resources Board
Stationary Source Division
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Tel: 916.324.0226

Fax: 916.324.8026

mhpham@arb.ca.gov

From: Douglas F. Grapple [<mailto:GrappleD@sbcapcd.org>]
Sent: Monday, June 27, 2011 11:20 AM
To: Pham, Minh@ARB
Cc: Ron L. Tan; Brian P. Shafritz
Subject: RE: Outline of Our Discussions on Thursday June 23

Oh, and can you verify that these concerns will not be approvability issues; ARB will forward the rule on to EPA for SIP consideration if we don't make changes to items 2 and 3 below?

Thanks again.

Douglas

From: Douglas F. Grapple
Sent: Monday, June 27, 2011 11:18 AM
To: Minh Pham (mhpham@arb.ca.gov)
Cc: Ron L. Tan; Brian P. Shafritz
Subject: Outline of Our Discussions on Thursday June 23

Hi Minh,

Just to outline your concerns and our preliminary responses on our proposed amended Rule 337, Aerospace Coatings.

You had concerns on four of the classifications:

1. **Adhesion Promoter** – recommended that we should change it to 850 g/l per other districts. I agreed.

2. **Antichafe Coating** – wanted us to lower it from 600 to 420 g/l (what SCAQMD has). I told you we would prefer to keep it at 600 g/l for consistency with the Control Technique Guideline (CTG), San Joaquin Valley, and Ventura County; that our air quality is not as bad as SCAQMD and our air quality status is similar to the Ventura County APCD’s air quality status.
3. **Fastener Sealant** –recommended that we go with the newly adopted SJV limit of 600 g/l. Again, I indicated we would prefer to keep it at 675 g/l, which is the same as the Ventura County APCD rule limit.
4. **Stripper** –suggested we lower the ROC content Limit from 400 to 300 g/l. I checked the VC rule limit and found it is at 300 g/l. Hence, I said we can make that change – not sure how industry will react, but we can put it into the draft PAR.

Thanks for your help on our rule development project.

Douglas Grapple
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
Phone: 805.961.8883
grappled@sbcapcd.org

Douglas F. Grapple

From: Douglas F. Grapple
Sent: Monday, June 27, 2011 10:26 AM
To: Nancy Adams (nadams@arb.ca.gov)
Subject: FW: Santa Barbara County APCD Proposed Amended Rule 353

On second thought, I am recommending we change the text to:

F. Requirements – Aerosol Adhesives Reactive Organic Compound Limit

Except as provided in Section ~~I of this rule~~, ~~a no~~ person shall ~~not~~ use any aerosol adhesive unless the reactive organic compound content, ~~including the propellant, does not exceed 75 percent by weight~~ complies with the California Air Resources Board consumer products regulation found in Title 17 of the California Code of Regulations, beginning at Section 94507.

Thanks again for your help on our adhesives rule.

Doug

From: Douglas F. Grapple
Sent: Thursday, June 23, 2011 4:07 PM
To: 'Adams, Nancy@ARB'
Subject: RE: Santa Barbara County APCD Proposed Amended Rule 353

Hi,

Since the consumer product rule has a maximum 75% and our rule is at 75% I think it will work as is.

Thanks.

Doug

From: Adams, Nancy@ARB [<mailto:nadams@arb.ca.gov>]
Sent: Thursday, June 23, 2011 4:03 PM
To: Douglas F. Grapple
Cc: Gomez, Jose@ARB
Subject: RE: Santa Barbara County APCD Proposed Amended Rule 353

Hi Doug-

Quick reply! What I was referring to in section F is that it is not in sync with the consumer products rule; the VOC limits for aerosol adhesives range from 55 to 75 percent, and I thought you might want to alter (not delete) this section of your rule so that it parallels to consumer product rule.

Thanks,
Nancy

Nancy Adams
916.324.8174
Air Pollution Specialist

From: Douglas F. Grapple [<mailto:GrappleD@sbcapcd.org>]
Sent: Thursday, June 23, 2011 3:53 PM
To: Adams, Nancy@ARB
Subject: Santa Barbara County APCD Proposed Amended Rule 353

Hi Nancy,

I received your voice message about the Rule 353 Section F 75% ROC limit and that the rule includes both **VOC** and **ROC** terms.

Section F

I considered deleting the Section F provision but decided against it. A source could procure an aerosol adhesive from out of state which could have VOC contents greater than the state consumer product regulations limit. By keeping Section F in, we will have an enforceable limit on the aerosol adhesives.

Mixed Use of VOC and ROC Terms

The rule refers to **VOC** in the sections regarding the manufacturer compliance statement (Section L), exemption (B.11), and in the titles of several source test methods (Section N). Section C, Definitions, includes a statement indicating that VOC has the same meaning as ROC. We included **VOC** in the provisions for manufacturers (Sections B.11 and L) because we felt it was a term of art they were familiar with.

Regarding our earlier discussion about the wording of some definitions:

1. I changed the **contact bond adhesive** definition to read:

“Contact Bond Adhesive” or “Contact Adhesive” means any adhesive intended by the manufacturer for application to both surfaces to be bonded together, which is allowed to dry before the two surfaces are placed in contact with each other, forms an immediate bond that is impossible, or difficult, to reposition after both adhesive-coated surfaces are placed in contact with each other, and does not need sustained pressure or clamping of surfaces after the adhesive-coated surfaces have been brought together using sufficient momentary pressure to establish full contact between both surfaces. Contact adhesive does not include rubber cements that are primarily intended for use on paper substrates. Contact adhesive also does not include vulcanizing fluids that are designed and labeled for tire repair only.

Existing SJV Rule 4653.3.29 (September 16, 2010) does not have “which.”

2. There are many other definitions that have the word **means** where it should be **is**. Thanks to your catches, I have corrected them all. (I probably created these errors when I did the initial rule by making the global change from **is** to **means** and I was unaware of the unintended consequences.)

Thanks for your help.

Douglas Grapple
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110

Phone: 805.961.8883
grappled@sbcapcd.org

Douglas F. Grapple

From: Adams, Nancy@ARB <nadams@arb.ca.gov>
Sent: Thursday, June 23, 2011 4:03 PM
To: Douglas F. Grapple
Cc: Gomez, Jose@ARB
Subject: RE: Santa Barbara County APCD Proposed Amended Rule 353

Hi Doug-

Quick reply! What I was referring to in section F is that it is not in sync with the consumer products rule; the VOC limits for aerosol adhesives range from 55 to 75 percent, and I thought you might want to alter (not delete) this section of your rule so that it parallels to consumer product rule.

Thanks,
Nancy

Nancy Adams
916.324.8174
Air Pollution Specialist
California Air Resources Board
California Environmental Protection Agency

From: Douglas F. Grapple [<mailto:GrappleD@sbcapcd.org>]
Sent: Thursday, June 23, 2011 3:53 PM
To: Adams, Nancy@ARB
Subject: Santa Barbara County APCD Proposed Amended Rule 353

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Regarding our earlier discussion about the wording of some definitions:

1. I changed the **contact bond adhesive** definition to read:

“Contact Bond Adhesive” or “Contact Adhesive” means any adhesive intended by the manufacturer for application to both surfaces to be bonded together, [which](#) is allowed to dry before the two surfaces are placed in contact with each other, forms an immediate bond that is impossible, or difficult, to reposition after both adhesive-coated surfaces are placed in contact with each other, and does not need sustained pressure or clamping of surfaces after the adhesive-coated surfaces have been brought together using sufficient momentary pressure to establish full contact between both surfaces. Contact adhesive does not include rubber cements that are primarily intended for use on paper substrates. Contact adhesive also does not include vulcanizing fluids that are designed and labeled for tire repair only.

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Thanks for your help.

Douglas Grapple
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
Phone: 805.961.8883
grappled@sbcapcd.org

Douglas F. Grapple

From: Law.Nicole@epamail.epa.gov
Sent: Thursday, March 03, 2011 5:03 PM
To: Douglas F. Grapple
Subject: Re: Specifying Provisions to Determine an Emission Control System's Capture and Control Efficiencies

Hi Doug,

Thanks for your inquiry. I am not quite sure why you want to refer to that particular test method language from the CFR. Could you please explain? If you are hesitant about including references to South Coast methods, we would accept language that only references the EPA methods. For example, see below:

2. Compliance with the Section D.3.a control equipment efficiency requirement for reactive organic compounds shall be determined by Environmental Protection Agency Test Methods 25, or 25A, ~~the South Coast Air Quality Management District Method 25.1, "Determination of Total Gaseous Non Methane Organic Emissions as Carbon," or the South Coast Air Quality Management District Method 25.3, "Determination of Low Concentration Non Methane Non Ethane Organic Compound Emissions from Clean Fueled Combustion Sources,"~~ as applicable. Environmental Protection Agency Test Method 18 or Air Resources Board Method 422 shall be used to determine emissions of exempt compounds.

3. Compliance with the Section D.3.b capture system efficiency requirement for reactive organic compounds shall be determined by verifying the use of a Permanent Total Enclosure and 100 percent capture efficiency as defined by Environmental Protection Agency Method 204, "Criteria for and Verification of a Permanent or Temporary Total Enclosure." Alternatively, if an Environmental Protection Agency Method 204 defined Permanent Total Enclosure is not employed, capture efficiency shall be determined using a minimum of three sampling runs subject to data quality criteria presented in the Environmental Protection Agency technical guidance document "Guidelines for Determining Capture Efficiency, January 9, 1995." Individual capture efficiency test runs subject to the Environmental Protection Agency technical guidelines shall be determined by:

a. The Temporary Total Enclosure approach of Environmental Protection Agency Methods 204 through 204F;
or

~~b. The South Coast Air Quality Management District "Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency."~~

This general language has already been approved by us in the South Coast rule, so it'd be easy to approve this language in your rule as well. If you really wanted to go with referencing those specific subsections from the CFR, someone here would have to take a closer look at the language and decide if it was appropriate for your rule. I hope this answers your question. Please feel free to contact me if you need further clarification, and again, I am interested in why you are choosing to deviate from our recommendations in the August 26, 2010 letter. Thanks.

Nicole

Nicole Law
Rulemaking Office, Air Division
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, 94105
Office: (415) 947-4126

Fax: (415) 947-3579

From: "Douglas F. Grapple" <GrappleD@sbcapcd.org>
To: Nicole Law/R9/USEPA/US@EPA
Date: 03/03/2011 02:26 PM
Subject: Specifying Provisions to Determine an Emission Control System's Capture and Control Efficiencies

Hi Nicole,

I have a couple of questions on the EPA recommendation for determining an emission control system's capture efficiency and control efficiency. The recommendation is shown in item 5 in the email below. Using that approach, the proposed amended Rule 337, Surface Coating of Aircraft or Aerospace Vehicle Parts and Products, Section I text would be:

2. Compliance with the Section D.3.a control equipment efficiency requirement for reactive organic compounds shall be determined by Environmental Protection Agency Test Methods 25, 25A, the South Coast Air Quality Management District Method 25.1, "Determination of Total Gaseous Non-Methane Organic Emissions as Carbon," or the South Coast Air Quality Management District Method 25.3, "Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources," as applicable. Environmental Protection Agency Test Method 18 or Air Resources Board Method 422 shall be used to determine emissions of exempt compounds.

3. Compliance with the Section D.3.b capture system efficiency requirement for reactive organic compounds shall be determined by verifying the use of a Permanent Total Enclosure and 100 percent capture efficiency as defined by Environmental Protection Agency Method 204, "Criteria for and Verification of a Permanent or Temporary Total Enclosure." Alternatively, if an Environmental Protection Agency Method 204 defined Permanent Total Enclosure is not employed, capture efficiency shall be determined using a minimum of three sampling runs subject to data quality criteria presented in the Environmental Protection Agency technical guidance document "Guidelines for Determining Capture Efficiency, January 9, 1995." Individual capture efficiency test runs subject to the Environmental Protection Agency technical guidelines shall be determined by:

a. The Temporary Total Enclosure approach of Environmental Protection Agency Methods 204 through 204F;
or

b. The South Coast Air Quality Management District “Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency.”

Rather than cite the South Coast AQMD methods and protocols, could we refer to the following subsections of 40 CFR 63, Subpart GG, Section 63.740:

(g) Overall VOC and/or organic HAP control efficiency - carbon adsorber, and

(h) Overall VOC and/or organic HAP control efficiency - control devices other than carbon adsorbers?

Would EPA approve such approach or should we follow the approach recommended in the August 26, 2010 email?

Thanks for your help on this rulemaking project.

Douglas Grapple

Santa Barbara County APCD

260 North San Antonio Road, Suite A

Santa Barbara, CA 93110

Phone: 805.961.8883

grapped@sbcapcd.org

From: Steckel.Andrew@epamail.epa.gov [<mailto:Steckel.Andrew@epamail.epa.gov>]

Sent: Thursday, August 26, 2010 1:27 PM

To: Douglas F. Grapple; mguzzett@arb.ca.gov

Cc: Law.Nicole@epamail.epa.gov

Subject: EPA comments on Santa Barbara 321



United States Environmental Protection Agency
Region IX
75 Hawthorne Street

August 26, 2010

Transmittal of EPA Rule Review Comments

To: Doug Grapple, Santa Barbara County Air Pollution Control District
grappled@sbcapcd.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: SBCAPCD Rule 321 Solvent Cleaning Machines and Solvent Cleaning, draft dated July 30, 2010

We are providing comments based on our preliminary review of the draft rule identified above. Please direct any questions about our comments to me at (415) 947-4115 or to Nicole Law at (415) 947-4126.

1. We recommend revising the exemption in section B.2 for architectural coating application equipment with solvents below 950 grams ROC per liter material to sunset in the future. South Coast AQMD 1171 and San Joaquin Valley APCD 4663 have both expired this exemption.
 2. To further reduce ROC emissions from solvent cleaning operations, we recommend raising the freeboard ratio requirement in section I.3 from 0.5 to 0.75. SCAQMD and SJVAPCD both already require freeboard ratios of at least 1.0 for degreasers.
 3. We agree with the comments for Rule 321 from CARB's comment letter dated June 8, 2010 to lower ROC limits to those already achieved in other California Air Districts.
 4. We are concerned that the current test method, EPA Method 24 in section P.1, is not the appropriate method to evaluate the exemption allowing solvents with 2% by weight or less of ROC in B.1. A more appropriate test method may be SCAQMD Method 313, as referenced in SCAQMD Rule 1122 Section (h)(1). We will notify the district if we find other acceptable test methods.
 5. It is inappropriate to reference an Illinois SIP in section P.3 and incorrect to reference 40 CFR 51 Appendix M, Methods 204-204F for control device efficiency. Consider replacing section P.3 and P.4 describing capture and control efficiency with language similar to that found in SCAQMD Rule 1122 Section (h)(7)(A) and (B).
 6. In section P.8, we do not recommend speciating the exhaust from an emission control system. Instead, we suggest EPA Method 18 to determine exempt compounds, as in SCAQMD Rule 1122 section (h)(7)(B).
-
-

Douglas F. Grapple

From: Steckel.Andrew@epamail.epa.gov
Sent: Thursday, August 26, 2010 1:27 PM
To: Douglas F. Grapple; mguzzett@arb.ca.gov
Cc: Law.Nicole@epamail.epa.gov
Subject: EPA comments on Santa Barbara 321



United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

August 26, 2010

Transmittal of EPA Rule Review Comments

To: Doug Grapple, Santa Barbara County Air Pollution Control District
grappled@sbcapcd.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: SBCAPCD Rule 321 Solvent Cleaning Machines and Solvent Cleaning, draft dated July 30, 2010

We are providing comments based on our preliminary review of the draft rule identified above. Please direct any questions about our comments to me at (415) 947-4115 or to Nicole Law at (415) 947-4126.

1. We recommend revising the exemption in section B.2 for architectural coating application equipment with solvents below 950 grams ROC per liter material to sunset in the future. South Coast AQMD 1171 and San Joaquin Valley APCD 4663 have both expired this exemption.
2. To further reduce ROC emissions from solvent cleaning operations, we recommend raising the freeboard ratio requirement in section I.3 from 0.5 to 0.75. SCAQMD and SJVAPCD both already require freeboard ratios of at least 1.0 for degreasers.
3. We agree with the comments for Rule 321 from CARB's comment letter dated June 8, 2010 to lower ROC limits to those already achieved in other California Air Districts.
4. We are concerned that the current test method, EPA Method 24 in section P.1, is not the appropriate method to evaluate the exemption allowing solvents with 2% by weight or less of ROC in B.1. A more appropriate test method may be SCAQMD Method 313, as referenced in SCAQMD Rule 1122 Section (h)(1). We will notify the district if we find other acceptable test methods.
5. It is inappropriate to reference an Illinois SIP in section P.3 and incorrect to reference 40 CFR 51 Appendix M, Methods 204-204F for control device efficiency. Consider replacing section P.3 and P.4 describing capture and control efficiency with language similar to that found in SCAQMD Rule 1122 Section (h)(7)(A) and (B).
6. In section P.8, we do not recommend speciating the exhaust from an emission control system. Instead, we suggest EPA Method 18 to determine exempt compounds, as in SCAQMD Rule 1122 section (h)(7)(B).

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**



P.O. Box 2815
Sacramento, California 95812

August 26, 2010

**Transmittal
of
ARB Staff Rule Review Comments**

To: Douglas Grapple, Air Quality Engineer
Santa Barbara County Air Pollution Control District
Telephone Number: (805) 961-8883
e-mail: grappled@sbcapcd.org

From: Patrick Au, (916) 322-3303
e-mail: pau@arb.ca.gov

The following proposed rules, which are scheduled for a public hearing to be held by your District Board on September 16, 2010, were received by us on August 3, 2010, for our review:

Rule 102	Definitions
Rule 202	Exemptions to Rule 201
Rule 321	Solvent Cleaning Machines and Solvent Cleaning

We have reviewed the rules and have the enclosed comments on Rules 202 and 321 on the following pages. These comments are reiteration of the comments we sent to you on June 8, 2010.

Mr. Glen Villa of the Technical Development Section, Measures Assessment Branch, Stationary Source Division, discussed our comments with you on August 11, 2010. We appreciate the District's efforts to address our previous comments. While the District will not incorporate our recommendations of the lower reactive organic compound (ROC) limits in this rulemaking, we understand that the District plans to consider the lower ROC limits when the rules are revisited in the 2013-2015 timeframe.

If you have any questions about our comments, please contact Mr. Jose Gomez, manager of the Technical Development Section, at (916) 324-8033.

Thank you for involving the Air Resources Board staff in your rule development process.

Rule review comments are on the following pages

Date: August 26, 2010

Air Resources Board Staff Comments on
Santa Barbara County Air Pollution Control District
Draft Rules 102, 202, and 321

Rule 102 Definitions

We have no comment on this rule.

Rule 202 Exemptions to Rule 201

Sections I.3., U.2.d.i., and U.3.

To provide consistency with Rule 321 Solvent Cleaning Machines and Solvent Cleaning, we recommend lowering the ROC content limit of 50 grams per liter or less to 25 grams per liter or less in sections I.3 and U.2.d.i. These sections should read as follows:

- I.3. Equipment used in surface coating operations provided that the total amount of coatings and solvents used does not exceed 55 gallons per year. [. . .] Cleaning agents meeting the criteria of Section U.2.b or Section U.2.c or that have a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Reference Method 24, do not contribute to the 55 gallons per year per stationary source limitation.

- U.2.d.i. Any solvent that has a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Method 24, or

- U.3. Wipe cleaning operations, provided that the solvents used do not exceed 55 gallons per year per stationary source and that the solvent cleaning complies with the requirements in Rule 321, Solvent Cleaning Machines and Solvent Cleaning.[...]Solvents meeting the criteria of 2.b. or c. above or that have a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Reference Method 24, do not contribute to the 55 gallons per year per stationary source limitation.

Rule 321 Solvent Cleaning Machines and Solvent Cleaning

Sections B.13, B.15, G.3, H.7, I.7, J.11, K.6, L.11, M.2, and M.3.

We recommend lowering the ROC content limit of 50 grams per liter or less to 25 grams per liter or less in sections B.13, B.15, G.3, H.7, I.7, J.11, K.6, L.11, M.2, and M.3. This will maximize the emission reductions and provide consistency with other district rules such as those in South Coast AQMD and San Joaquin Valley APCD.

Section M.1. Solvent Requirements

While we understand the District's rationale for wanting to lower the ROC limits incrementally, we believe it is feasible to lower the ROC limits further than currently proposed in Rule 321. We recommend lowering ROC content limits to match the limits shown below that are currently in the South Coast AQMD Rules 1171 and 1124, and San Joaquin Valley APCD Rule 4663.

Solvent and Cleaning Activity	ROC Limit	
	<u>From</u> g/l (lb/gal)	<u>To</u> g/l (lb/gal)
(a) Product Cleaning During Manufacturing Processes and Surface Preparation for Coating Application:		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals	900 (7.51)	800 (6.7)
(b) Repair Cleaning and Maintenance Cleaning:		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals:		
(I) Tools, Equipment, & Machinery	900 (7.51)	800 (6.7)
(II) General Work Surfaces	900 (7.51)	600 (5.0)
(c) Cleaning of Coatings Application Equipment	950 (7.51)	25 (0.21)
(d) Cleaning of the Following Items and Equipment and their Components:	900 (7.51)	200 (1.68)
(i) Aerospace Vehicles;		
(ii) Aerospace Vehicle Payloads and Satellites;		
(iii) Aerospace Vehicle, Aerospace Vehicle Payload, and Satellite:		
(I) Transport Equipment (e.g., railcars, trucks, trailers, forklifts, and containers), and		
(II) Support Processing Equipment (e.g., clean rooms, tools, payload fairing fixtures, alignment jigs, fuel and oxidizer loading carts and associated transfer lines).		

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**



P.O. Box 2815
Sacramento, California 95812

June 8, 2010

**Transmittal
of
ARB Staff Rule Review Comments**

To: Douglas Grapple, Air Quality Engineer
Santa Barbara County Air Pollution Control District
Telephone Number: (805) 961-8883
e-mail: grappled@sbcapcd.org

From: Patrick Au, (916) 322-3303
e-mail: pau@arb.ca.gov

The following rules, which are to be considered at a Community Advisory Council meeting scheduled for June 9, 2010, were received by us on March 30, 2010, for our review:

Rule 102	Definitions
Rule 202	Exemptions to Rule 201
Rule 321	Solvent Cleaning Machines and Solvent Cleaning

We have reviewed the rules and have the enclosed comments on Rules 202 and 321 on the following pages.

Mr. Glen Villa of the Technical Development Section, Measures Assessment Branch, Stationary Source Division, discussed our comments with you on April 22, 2010. Mr. Villa indicated to me that the District will not incorporate our recommendations in this rulemaking. However, the District will consider them when the rules are revisited in the 2013-2015 timeframe.

If you have any questions about our comments, please contact Mr. Jose Gomez, manager of the Technical Development Section, at (916) 324-8033.

Thank you for involving the Air Resources Board staff in your rule development process.

Rule review comments are on the following pages

Air Resources Board Staff Comments on
Santa Barbara County Air Pollution Control District
Draft Rules 102, 202, and 321

Rule 102 Definitions

We have no comment on this rule.

Rule 202 Exemptions to Rule 201

Sections I.3., U.2.d.i., and U.3.

To provide consistency with Rule 321 Solvent Cleaning Machines and Solvent Cleaning, we recommend lowering the ROC content limit of 50 grams per liter or less to 25 grams per liter or less in sections I.3 and U.2.d.i. Additionally, we recommend lowering the 55 gallon per year threshold in sections I.3 and U.3 to 22 gallons per year. These sections should read as follows:

- I.3. Equipment used in surface coating operations provided that the total amount of coatings and solvents used does not exceed 22 gallons per year. [. . .] Cleaning agents meeting the criteria of Section U.2.b or Section U.2.c or that have a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Reference Method 24, do not contribute to the 22 gallons per year per stationary source limitation.

- U.2.d.i. Any solvent that has a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Method 24, or

- U.3. Wipe cleaning operations, provided that the solvents used do not exceed 22 gallons per year per stationary source and that the solvent cleaning complies with the requirements in Rule 321, Solvent Cleaning Machines and Solvent Cleaning.[...]Solvents meeting the criteria of 2.b. or c. above or that have a reactive organic compound content of 25 grams per liter or less, as determined by the Environmental Protection Agency Reference Method 24, do not contribute to the 22 gallons per year per stationary source limitation.

Rule 321 Solvent Cleaning Machines and Solvent Cleaning

1. Sections B.13, B.15, G.3, H.7, I.7, J.11, K.6, L.11, M.2, and M.3.

We recommend lowering the reactive organic compound (ROC) content limit of 50 grams per liter or less to 25 grams per liter or less in sections B.13, B.15, G.3, H.7, I.7, J.11, K.6, L.11, M.2, and M.3. This will maximize the emission reductions and provide consistency with other district rules such as those in South Coast AQMD and San Joaquin Valley APCD.

2. Sections B.15 and B.18

We recommend lowering the net aggregate amount of solvent from 55 gallons per year to 22 gallons per year or less in sections B.15 and B.18. This will maximize the emission reductions and provide consistency with other district rules such as those in South Coast AQMD.

3. Section M.1. Solvent Requirements

While we understand the District’s rationale for wanting to lower the ROC limits incrementally, we believe it is feasible to lower the ROC limits further than currently proposed in Rule 321. We recommend lowering ROC content limits to match the limits shown below that are currently in the South Coast AQMD Rules 1171 and 1124, and San Joaquin Valley APCD Rule 4663.

Solvent and Cleaning Activity	ROC Limit	
	<u>From</u> g/l (lb/gal)	<u>To</u> g/l (lb/gal)
(a) Product Cleaning During Manufacturing Processes and Surface Preparation for Coating Application:		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals	900 (7.51)	800 (6.7)
(b) Repair Cleaning and Maintenance Cleaning:		
(i) General	50 (0.42)	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.51)	100 (0.84)
(iii) Medical Devices & Pharmaceuticals:		
(I) Tools, Equipment, & Machinery	900 (7.51)	800 (6.7)
(II) General Work Surfaces	900 (7.51)	600 (5.0)
(c) Cleaning of Coatings Application Equipment	950 (7.51)	25 (0.21)
(d) Cleaning of the Following Items and Equipment and their Components:		
(i) Aerospace Vehicles;		
(ii) Aerospace Vehicle Payloads and Satellites;		

Solvent and Cleaning Activity

ROC Limit
From **To**
g/l (lb/gal) g/l (lb/gal)

(iii) Aerospace Vehicle, Aerospace Vehicle Payload,
and Satellite:

(I) Transport Equipment (e.g., railcars, trucks,
trailers, forklifts, and containers), and

(II) Support Processing Equipment (e.g., clean
rooms, tools, payload fairing fixtures,
alignment jigs, fuel and oxidizer loading
carts and associated transfer lines).

900 (7.51)

200 (1.68)

Douglas F. Grapple

From: patrick au <pau@arb.ca.gov>
Sent: Tuesday, June 24, 2008 2:42 PM
To: Douglas F. Grapple
Subject: [Fwd: Re: [Fwd: Question on SIP Submittals]]

Hi Douglas,

Region 9 responded favorably to your request on not providing reference for fee rules in SIP submittal. However, they prefer that the Completeness Checklist not be modified. Please see below.

Patrick

----- Original Message -----

Subject: Re: [Fwd: Question on SIP Submittals]
Date: Tue, 24 Jun 2008 14:13:34 -0700
From: Steckel.Andrew@epamail.epa.gov
To: patrick au <pau@arb.ca.gov>
CC: allen.cynthia@epa.gov

Hi Patrick - We're okay if you don't want to provide fee provisions so long as the reference in the submitted rule provides both the fee rule number and title. I'm less comfortable okaying Doug's change to the checklist that would remove all administrative procedures, as I could imagine that some would be more important for us to rely on and include in the record when approving a rule. - Andy

patrick au
<pau@arb.ca.gov>

06/19/2008 10:05
AM

To
Andrew Steckel/R9/USEPA/US@EPA
cc
Cynthia Allen/R9/USEPA/US@EPA
Subject
[Fwd: Question on SIP Submittals]

Hi Andy,

Please see Santa Barbara's note below regarding referenced rule requirement in the SIP Completeness Checklist. This is an EPA SIP submittal requirement and I thought it is appropriate that you make the call whether they can do without it. Thanks.

Patrick

----- Original Message -----

Subject: Question on SIP Submittals

Date: Wed, 18 Jun 2008 17:04:56 -0700

From: GrappleD@sbcapcd.org

To: pau@arb.ca.gov

Hi Patrick,

One of the items in the SIP Completeness Checklist indicates we are to include a complete copy of any referenced rules, unless the rule has already been submitted to EPA as part of a previous SIP submittal.

I am wondering if ARB can waive the requirement for a copy when the referenced rule is our Rule 210, Fees. As you know, our Rule 210 is strictly an administrative-type rule, not one that is or that we want to have included in the SIP. Thus, we have not submitted it to ARB with a request that ARB forward it to EPA for inclusion in the SIP.

When we submitted revised Rule 202 and new Rule 361 (on Feb. 12, 2008), we included Rule 210 because Rule 202 refers to it. We strive to be thorough and complete in our SIP submittals. However, I am just wondering if there is any value in our continuing to submit Rule 210. It seems that a change to the SIP completeness checklist would clear-up this matter.

COMPLETE COPY OF THE REFERENCED RULE(S):
For any rule which includes language specifically referencing another rule, a copy of that other rule must also be submitted, unless 1) it has already been submitted to EPA as part of a previous SIP submittal or 2) it is not a rule that needs to be included in the SIP because it regulates local administrative procedures.

I am confronted with this problem because we plan to submit a SIP package soon that will include new revisions to our Rule 202.

Thanks, Patrick.

Douglas Grapple
Santa Barbara County APCD
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110
Phone: 805.961.8883
grappled@sbcapcd.org

Technical Support Document
for
EPA's Notice of Proposed Rulemaking
on the

California State Implementation Plan

as submitted by the California Air Resources Board for
the Santa Barbara County Air Pollution Control District

EPA's Analysis
of Santa Barbara County Air Pollution Control District's
Rule 330, Surface Coating of Metal Parts and Products

United States Environmental Protection Agency, Region IX
Air Division

July 1998

Jerald S. Wamsley

**Santa Barbara County Air Pollution Control District (SBCAPCD),
Rule 330, Surface Coating of Metal Parts and Products.**

Chronology of SBCAPCD Adoption, CARB Submittal, and EPA Actions

- The Santa Barbara County Air Pollution Control District (SBCAPCD) Governing Board adopted Rule 330 on April 21, 1995.
- The California Air Resources Board (CARB) submitted Rule 330 to EPA on October 13, 1995 as a revision to the California State Implementation Plan (SIP).
- On November 28, 1995, EPA found complete CARB's October 13, 1995 submittal of Rule 330.

EPA has reviewed, approved, and incorporated into the SIP a prior version of Rule 330 (see 47 Federal Register (FR) 19330, May 5, 1982.) This version of Rule 330 was adopted by the SBCAPCD Governing Board on June 11, 1979. Since 1979, Rule 330 has been amended on three occasions during 1990, but these versions were not submitted to USEPA.

Rule Summary

SBCAPCD Rule 330, Surface Coating of Metal Parts and Products, is a rule designed to reduce volatile organic compound (VOC) emissions at industrial sites engaged in metal coating operations. VOCs are emitted during the preparation and coating of the metal parts, as well as the drying phase of the coating process. Rule 330 establishes general emission limits of VOC per litre of coating less water and exempt compounds as applied. It also allows for the use of add-on emission controls with a combined capture/control efficiency of 85 percent.

SBCAPCD's April 21, 1995 amendments to Rule 330 included these significant changes to its 1990 adopted version:

- the exemption section was moved to Section B;
- sources no longer have to prove that a suitable coating does not exist to use non-compliant coating in an unconstrained number of twenty gallon formulations. (Section B.1.);
- sources using non-compliant coatings under the twenty gallon per formulation exemption now have a 200 gallon per year limit, (Section B.1.);
- the 180 grams/litre (gr/l) emission limit for baked coatings at new facilities was deleted allowing the 275 gr/l general limit for baked coating to be operative. (formerly Section D.4.); and
- sources may now keep monthly rather than daily records. (Section H.).

The submitted Rule 330 differs significantly from the June 11, 1979 applicable SIP version. The submitted rule contains new and revised definitions, as well as capture and control efficiency, application equipment, closed container, labelling, record keeping, and test method requirements. This 1979 applicable SIP version of Rule 330 is attached.

Rule Evaluation

1. Statutory Requirements & EPA Guidance

In section 182(a)(2)(A) of the Clean Air Act Amendments (CAA) of 1990, Congress required that nonattainment areas, such as the Santa Barbara County Air Pollution Control District, fix their deficient reasonably available control technology (RACT) rules for volatile organic compounds (VOCs) and established a May 15, 1991 deadline for states to submit corrections of those deficiencies. The CAA requires the Santa Barbara County ozone nonattainment area to adopt and correct RACT rules pursuant to pre-amended (the Clean Air Act prior to its 1990 amendment) section 172(b) as interpreted in pre-amendment guidance. This guidance included the following documents:

- "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations," USEPA, May 28, 1988; and
- "Control of Volatile Organic Emissions from Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products," USEPA, June 1978, EPA-450/2-78-015.

EPA used these guidance documents and subsequent agency policy memoranda and guidance to evaluate Rule 330.

2. Evaluation of Rule

Rule 330's VOC emission limits are more restrictive than the respective CTG requirement and the rule contains adequate test methods provisions for monitoring the compliance of regulated facilities. However, several portions of the rule are inconsistent with EPA policy and guidance.

EPA commented on the preadoption drafts of Rule 330 in early 1995.¹ In its February 9, 1995 comment letter, EPA recommended the changes to Rule 330 described below.

- Section B.1. allows a source to use annually up to 200 gallons of non-compliant coating. This

¹ See attached correspondence: Helen Liu, USEPA to Tad Bixler, SBCAPCD dated February 9, 1995.

exceeds EPA's general policy of allowing 55 gallons of non-compliant coating per year as a low use exemption cut-off.²

- Section H. does not require daily record keeping to track the use of non-compliant coatings.

The SBCAPCD adopted Rule 330 without addressing these issues. Attachment 1-1 of the Rule 330 Staff Report lists SBCAPCD's response to EPA's February 9, 1995 comment letter and the SBCAPCD response is summarized here. The 200 gallon annual limit should be allowed for two reasons: first, it is more stringent than an unlimited use of non-compliant coatings in 20 gallon or less formulations as allowed formerly; and second, no metal coating VOC source in Santa Barbara County emits more than 10 tons per year; therefore, EPA policy towards major sources should not apply. Regarding the record keeping issue, SBCAPCD noted that users of non-compliant coatings who comply with Rule 330 using emission control equipment are required to maintain daily records of the equipment's key operating parameters and maintenance procedures so as to demonstrate continuous operation and compliance with the rule.

In either case, the SBCAPCD rebuttals do not remedy the issues raised by EPA's February 9, 1995 comment letter. Although the 200 gallon annual limit is more stringent than the potential abuse of an unlimited number of 20 gallon or less formulations, this limit remains inconsistent with EPA's 55 gallon limit for low use exemptions. Similarly, the record keeping requirements for those sources using emission control equipment are acceptable for those users; however, this requirement does not address the need for all sources to keep daily records of their non-compliant coating use so as to demonstrate continuous compliance with the rule.

Regarding the change in emission limit for new sources from 180 gr/l to 275 gr/l, the SBCAPCD estimates that the rule change will result in an emissions increase of 260 pounds/year from a single source (see "Negative Declaration for Rule 330," page 7; attached to Final Staff Report.) Against the 1996 projected ROG inventory of 42 tons per day, this amount is insignificant. Furthermore, the 275 gr/l emission limit remains more restrictive than CTG RACT requirements.

3. Recommendations for Future Revisions

EPA suggests the following changes to Rule 330 at the next available opportunity:

Since Rule 330 was adopted, EPA has revised methods for determining capture efficiency. Methods 204 and 204A-F should be incorporated within Section I.3. replacing the USEPA's "Guidelines for Determining Capture Efficiency" document listed currently. This suggested change either updates or improves the clarity of Rule 330. It does not provide sufficient cause

² See attached guidance: Memorandum, "Exemption for Low-Use Coatings." G.T. Helms to Air Branch Chiefs, Regions I-IX, USEPA, August 10, 1990.

for disapproving the rule.

4. Rule Deficiencies

The following sections should be amended to be consistent with the applicable CTG and EPA policy:

- Section B.1., Exemptions; and
- Section H. Record keeping.

Issues concerning these sections are discussed above in the rule evaluation section of this TSD.

Projected Impact of Rule 330

Rule 330 is listed as a control measure in the 1994 Clean Air Plan (CAP) and is a credited measure within the 1994 Rate of Progress (ROP) Plan (see '94 CAP at Table 4-2, page 4-10.) EPA approved the ROP Plan and its list of measures at 62 FR 1189, January 8, 1997. Appendix B of the 1994 CAP describes the 1996 baseline emissions for the affected metal parts and products inventory at 0.93 tons per day (tpd) of ROG (see page 2-20). Within the 1994 CAP, Rule 330 is credited with 0.06 tpd in ROG emission reductions.

Recommendation

Section 110(k) of the CAA contains provisions governing EPA's review of plans and regulations submitted by states and localities for inclusion in the California State Implementation Plan. EPA can take one of four actions on Rule 330: full approval, conditional approval, limited approval, or a disapproval.

To review, Rule 330's coating VOC emission limits conform to the relevant CTG and the rule improves upon the 1979 version within the applicable SIP. However, SBCAPCD did not remedy the Appendix D/VOC RACT deficiencies cited by EPA in its February 9, 1995 comment letter. Consequently, Rule 330 contains several appendix D/RACT deficiencies and does not fulfill all of the RACT requirements of CAA section 182(a)(2)(A). Although Rule 330's emission limits and general improvements strengthen the SIP, EPA cannot grant full approval given the rule's deficiencies.

Consequently, EPA recommends a proposal of limited approval/limited disapproval for Rule 330. Surface Coating of Metal Parts and Products.

Attachments

1. Rule 330, Surface Coating of Metal Parts and Products. amended 4/21/95 (including change copy dated 4/21/95).
2. Rule 330, Surface Coating of Metal Parts and Products, adopted 6/11/79.
3. "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations," USEPA, May 28, 1988, cover piece only.
4. "Control of Volatile Organic Emissions from Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products," USEPA, June 1978, EPA-450/2-78-015, cover piece only.
5. Correspondence, Helen Liu, USEPA to Tad Bixler, SBCAPCD dated February 9, 1995.
6. Memorandum, "Exemption for Low-Use Coatings," G.T. Helms to Air Branch Chiefs, Regions I-IX, USEPA, August 10, 1990
7. "Final Staff Report: Proposed Amendments to Rule 330, Surface Coating of Metal Parts and Products," Santa Barbara County Air Pollution Control District, March 28, 1996.

United States Environmental Protection Agency, Region IX

Air & Toxics Division

Technical Support Document

for

EPA's Notice of Direct Final Rulemaking

for the

California State Implementation Plan

Santa Barbara County Air Pollution Control District

Rule 337 - Surface Coating of Aircraft or
Aerospace Vehicle Parts and Products

Helen Liu
September 20, 1995

Agency Name: Santa Barbara County Air Pollution Control District (SBCAPCD)

Submitted Rule: Rule 337 - Surface Coating of Aircraft or Aerospace Vehicle Parts and Products

Adopted: October 20, 1994

Submitted: January 24, 1995

RULE SUMMARY

The Santa Barbara County Air Pollution Control District Rule 337 controls volatile organic compound emissions from the surface coating of aircraft or aerospace vehicle parts and products. It was submitted by the California Air Resources Board (CARB) to EPA on January 24, 1995. The rule will be part of the SIP for reducing ozone levels in the Santa Barbara area, which has been designated moderate for ozone. Rule 337 was submitted to comply with State and Federal requirements.

RULE HIGHLIGHTS

The following is a list of the major elements in Rule 337:

Section (A) discusses the applicability of this rule.

Section (B) lists the types of coatings or operations that are exempt from this rule. Section (B)(1) exempts coatings with separate formulations used in volumes of less than 20 gallons in any calendar year provided that the total volume of non-compliant coatings used at a stationary source does not exceed 200 gallons annually.

Section (C) lists definitions specific to this rule. SBCAPCD Rule 102 contains definitions not restricted to this rule.

Section (E)(1) lists the ROC limits for different coating categories.

Section (E)(3) discusses the control and capture efficiency requirements for add-on exhaust control equipment used to achieve compliance with Section (D)(1).

Section (F) requires ROC-containing materials to be stored in closed containers.

Section (G) includes details about labeling requirements.

Section (H) lists the recordkeeping requirements.

Section (I) refers to the test methods used to ensure compliance.

RULE DISCUSSION

Section B contains a low usage coatings exemption that limits a facility to 200 gallons per year total of low usage coatings. Aerospace rules in other parts of the country have included a low usage exemption of 55 gallons per year plantwide. In this particular case, a 200 gallon limit is justified because it will not result in significant increase in emissions.

Section D includes coating limits that exceed the limits found in the Control Technique Guideline (CTG) for Miscellaneous Metal Parts and Products, which is what the Aerospace source category is currently subject to. However, EPA is planning to publish an Aerospace CTG in the near future. Most of the rule's limits for the different specialty coatings are within the proposed limits of the upcoming CTG. However, section D includes an ROC limit of 1000 g/l for the "Other Space Vehicle Coating" category. This unusually high limit is necessary due to the extreme conditions that a space vehicle must experience as it passes through the atmosphere and into space.

EPA's general policy on recordkeeping is to require daily records for non-compliant coatings. Section (B)(1) exempts up to 200 gallons annually for a stationary source. Rule 337 would be strengthened if it required daily records for these exempt coatings.

Section (I)(3) includes language regarding the test method for capture efficiency. This should be replaced with EPA's most recent guidance. The appropriate language reads as follows:

Capture efficiency shall be determined according to EPA's technical document, "Guidelines for Determining Capture Efficiency," January 9, 1995.

RULE EVALUATION

SBCAPCD Rule 337 has been evaluated for consistency with EPA requirements found in the Clean Air Act, as amended (CAA), and other EPA policies. These requirements are found under Section 110 and Part D of the CAA and in 40 CFR part 51 (Requirements for Preparation, Adoption, and Submittal of Implementation Plans). Further EPA policy guidance is found in "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations, Clarification to Appendix D of November 24, 1987 Federal Register" (Attachment 2 - "Bluebook" cover).

The Rule contains no significant deficiencies and is consistent with the Clean Air Act (CAA), EPA regulations, and EPA policy. The proposed rule will strengthen the SIP and is recommended for approval under section 110(k)(3) of the CAA as meeting the requirements of section 110 and part D. Although EPA is proposing to approve this rule, if the rule is in conflict with the future CTG for aerospace assembly and component coating operations, EPA will SIP-call this rule and require the district

to make the necessary changes.

Attachments:

1. Submitted Rule 337: Surface Coating of Aircraft or Aerospace Vehicle Parts and Products.
2. Cover of Bluebook: "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 FEDERAL REGISTER," May 25, 1988.
3. Proposed RACT VOC limits for aerospace specialty coatings.

TABLE 1

MACT LIMITS FOR COATINGS
 (As specified and compliance dates established by the
 Aerospace NESHAP)

Coating	MACT Limit (grams VOC/liter) Commercial and Military
Topcoats	420
Primers	350
Maskants - Type II	160

These expected limits are to be established by the Aerospace NESHAP. Timeframes for compliance with these limits will be contained in the final NESHAP to be promulgated in 1995.

TABLE 2

RACT LIMITS FOR SPECIALTY COATINGS^a

Specialty Coating	RACT Limit (grams VOC/liter) Commercial and Military
Sealants - Extrudable/Rollable	120
Sealants - Brushable	240
Sealants - Sprayable	600
Adhesives - Rocket Motor Bonding	890
Adhesives - Structural, autoclavable	60
Adhesives - Structural, non-autoclavable	850
Adhesives - Non-structural	360
Adhesives - Fuel Tank	620
Adhesives - Rubber Based	700
Adhesives - Commercial Interior	760
Adhesives - Cyanoacrylates	1020
Adhesive Bonding Primers <250°F	850
Adhesive Bonding Primers >250°F	1030
Maskants - Type I	720
Maskants - Bonding	1230
Maskants - Critical Use/Line Sealer	1020
Maskants - Seal Coat	1230

TABLE 2 (Continued)

Specialty Coating	RACT Limit (grams VOC/liter) Commercial and Military
Ablative	600
Adhesion Promoter	890
* Antichafe	660
* Clear	720
* Commercial Exterior Primer	650
Compatible Substrate Primer	780
Corrosion Inhibiting Compound	710
Electric or Radiation Effect ^b	800
Electrostatic Discharge and Electromagnetic Interference	800
Elevated Temperature Skydrol Resistant Commercial Primer	740
* Epoxy Polyamide Topcoat	660
Fire Resistant (Interior)	800
* Flexible Primer	640
Flight Test	
- Missile or Single Use Aircraft	420
- All Other	840
* Fuel Tank	720
High Temperature	850
Impact Resistant	420
Inks	
- Screen Printing	840
- Part Marking (includes temporary marking and stencil)	850
Insulation	740
Intermediate Release	730
Lacquers	830
* Metallized Epoxy	740
Mold Release	780
Optical Anti-Reflection	750
Pretreatment	780
Protective Oils/Waxes	840
Rain Erosion Resistant	850
Rocket Motor Nozzle Coatings	660
Solid Film Lubricant	880
* Space Vehicle	890
Specialized Function ^c	890
Temporary Protective	320
Thermal Control	800
* Wine	850

^a Aerosol and touch-up are exempt.

^b Coatings used on Low Observable aircraft or other designated by the Department of Defense such that the coating formulations are classified exempt.

^c Specialized function coatings are any coatings not listed above that fulfill extremely specific engineering requirements, are limited in application, and are characterized by low volume usage.

4/14/94

4

* Limits not yet finalized.

**ISSUES RELATING TO VOC REGULATION
CUTPOINTS, DEFICIENCIES, AND DEVIATIONS**

***Clarification to Appendix D
of November 24, 1987 FEDERAL REGISTER***

May 25, 1988

*Ozone/Carbon Monoxide Program Branch
Air Quality Management Division
Office of Air Quality Planning and Standards*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

RECEIVED
FEB 14 1995
SB CO. APCD

February 9, 1995

Tad Bixler, Air Quality Engineer
Santa Barbara County Air Pollution Control District
26 Castilian Drive B-23
Goleta, CA 93117

Re: Proposed Revision to Rule 330 (Surface Coating of Metal Parts and Products)

Dear Mr. Bixler:

Thank you for the opportunity to review the version of Rule 330 whose tentative adoption date is April 20, 1995. The U.S. EPA has the following comments on the draft rule:

Section B.1 allows a stationary source to use up to 200 gallons of non-compliant coatings. This exceeds the EPA's general policy of 55 gallons for the low-usage exemption cut-off. Section B.1 also does not include coatings from Section B.2, B.3, and B.4 in the volume of coatings used under this low-usage exemption. EPA's policy includes all low-use coatings in this exemption.

Section H does not include recordkeeping requirements for non-compliant coatings. EPA feels that usage of non-compliant coatings should be recorded daily.

We have no other comments on this rule. If you have any questions, please call me at (415) 744-1199.

Sincerely,

A handwritten signature in cursive script that reads "Helen Liu".

Helen Liu,
Rulemaking Section

13
100-10-1537 10-42 FROM ARB SSB HEND & END 10 31885010001 7.61
Rule 337 Future

California Air Resources Board



FAX TRANSMISSION

P.O. Box 2815
Sacramento, CA 95812
Fax: (916) 445-5023

Date: February 2, 1995
Pages to follow: 2
For Transmission Problems: Mr. Jim Sane, (916) 327-1509

Rule Review Comments

Please Deliver As Soon As Possible To:
Mr. Larry Rennacker
Supervisor, Rule Development Section
Santa Barbara County Air Pollution Control District
Fax Number: (805) 961-8801

From: Air Resources Board staff

The following rule, amended at a public hearing held on October 20, 1994, was received by us on December 8, 1994 for our review:

Rule 337 Surface Coating of Aircraft or Aerospace Vehicle Parts and Products

We have reviewed the rule and have the comments on the following pages. We ask that you consider our comments when you next present the rule to your District Board for amendment.

If you have any questions about our comments, please contact Ms. Peggy Taricco, Manager, Solvent Section, Stationary Source Division at (916) 322-8283.

The rule was forwarded to the U.S. Environmental Protection Agency on January 24, 1995 as a revision to the State Implementation Plan.

Thank you for involving the ARB staff in your rule development process.

Feb 2, 1995

Date: February 02, 1995

Enclosure

Air Resources Board Staff Comments On
Santa Barbara County Air Pollution Control District
Amended Rule 337

Rule 337 Surface Coating of Aircraft or Aerospace Vehicle Parts and Products

1. Section D.1 - Requirements - ROC Limits: Section D.1 states that "A person shall not apply any coating . . . which, as applied, emits or may emit reactive organic compounds" The word "emit" is not consistent with language used in the table following, which lists coating limits in terms of ROC content (g/l), and it is not consistent with Section D.2.a (i.e., stripper "contains"). As written, Section D.1 may be misleading since labeling is done on the basis of VOC content and not VOC emissions. Use of the term "contains" would be consistent with other sections in Rule 337, and with similar rules in other districts. We recommend that the first sentence in Section D.1 be changed as follows:

A person shall not apply any coating or specify the use of any coating which, as applied, contains reactive organic compounds in excess of the limits shown in the table below.

2. Section D.3.a - Requirements - ROC Limits: Section D.3.a states "The control device shall reduce emissions from an emission collection system by at least 95 percent by weight." This sentence can be clarified by adding language as follows:

The control device shall reduce ROC emissions from vapors and gases collected by an emission collection system by at least 95 percent by weight.

3. Section E - Requirements - Application Equipment: Section E states "A person shall not apply coatings . . . except by using properly operated equipment" The use of the word "properly" is subject to interpretation. We recommend that the District change this sentence to read:

A person shall not apply coatings subject to the provisions of this rule except by operating equipment according to manufacturers operating guidelines and by:

4. Section G - Requirements - Labeling: The last sentence in Section G.2 states "The recommendation shall specify that the coating is to be employed without thinning . . . unless any thinning recommended . . . does not cause a coating to exceed its applicable standard." This statement can be clarified by adding language to the sentence as follows:

The recommendation shall specify that the coating is to be employed without thinning or diluting under normal environmental and application conditions unless any thinning recommended on the label for normal environmental and application conditions does not cause the coating to exceed its applicable standard for ROC content.

5. Section G.3 - Requirements - Labeling: The last sentence in Section G.3 states "ROC content displayed may be calculated using product formulation data, or may be determined using the test method in Section I." This sentence can be clarified by adding language as follows:

ROC content displayed may be calculated using product formulation data and the formula in Section C.11. or may be determined using the test method in Section I.

6. Section H.1 - Recordkeeping: Section H.1 contains a requirement for the "specific mixing ratio" to be listed on a current listing of all ROC-containing materials in use at their facility; however, the term "specific mixing ratio" is not defined in the rule. We recommend that a definition for "specific mixing ratio" be added to Section C of Rule 337.

AIR RESOURCES BOARD

1102 Q STREET
P.O. BOX 2815
SACRAMENTO, CA 95812



RECEIVED

March 27, 1991

APR 3 1991

SB CO. APCD

Mr. James M. Ryerson
Air Pollution Control Officer
Santa Barbara County Air Pollution
Control District
26 Castilian Drive, B-23
Goleta, CA 93117

Dear Mr. Ryerson:

Adopted Amendments to Rule 330

The staff of the Air Resources Board has reviewed the amendments to Rule 330, Surface Coating of Metal Parts and Products, that were adopted by your District Board on November 13, 1990. We received the amendments on February 11, 1991.

Most of the enclosed comments are a reiteration of comments which were conveyed to the District in our November 5, 1990 letter. We acknowledge and appreciate your commitment to address our comments on Rule 330 when you next revisit the rule. We recognize that some of the rule amendments that have been adopted by your Board are intended to address deficiencies identified by the Environmental Protection Agency (EPA) in their Post-1987 State Implementation Plan (SIP) Call. Accordingly, as you have requested, we will forward amended Rule 330 to the EPA as a revision to the SIP.

If you have any questions concerning comments 1 through 4, 7 and 9, please contact George Lew, Engineering Evaluation Branch, at (916) 445-0657. For comments 5, 6, and 8, contact Dean Simeroth, Criteria Pollutants Branch, at (916) 322-6020.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Sylte" or similar, written in a cursive style.

William W. Sylte
Chief Deputy Executive Officer

Enclosure

Date: 3/27/91

Enclosure

Air Resources Board Staff Comments on
Santa Barbara County APCD Adopted Rule 330

CRITICAL ISSUES

1. Section B.6: This section defines the symbol "Ws" as "weight of volatile organic compounds in grams" but the rule does not define "volatile organic compounds" and the definitions of most other districts for "volatile organic compounds" equate with "ROC" as used in this rule. Further, weight of volatile organic compounds is not directly measured in standard test methods. This rule should either provide a definition of "volatile organic compounds" or use the equation $(W_V - W_W - W_{ES}) / (V_M - V_W - V_{ES})$ where "W_V" is weight of all volatile material (ROC, water and exempts), W_W is the weight of water and other symbols are as defined in the rule.
2. Section H.1: The restrictions of this rule are on "ROC content", not "solvent content", and this section should reflect this fact if solvent is not specifically defined to be synonymous with ROC.

EPA Method 24 does not provide for exclusion of halogenated exempt compounds from ROC. A supplementary method such as ARB Method 432 or ASTM D4457-85 should be specified for quantifying halogenated exempt compounds.

3. Section H.2: ARB Method 100 does not provide for deduction of halogenated exempt compounds from emissions. It is unclear that the intent of this section is to require quantification of exempt compounds by EPA Method 18. The section should clearly specify what each test method is to be used to measure. See the comment on Section C.5.

RULE IMPROVEMENT SUGGESTIONS

4. Section B: A definition of "ROC" in Rule 102 is cited in Rule 330's definition of "exempt compounds". "ROC" should also be clearly defined in Rule 330, citing Rule 102 as appropriate.
5. We wish to reiterate our comments made on the proposed rule, conveyed to you in our letter dated November 5, 1990. Specifically our comments regarding Section B.9. (Industrial Maintenance Coating Definition),

Section C.2. (Non-Powder Industrial Maintenance Coatings), and Section E (Requirements-Closed Containers).

We still believe that a standard of 420 g/l (grams per liter) for the category of "Industrial Maintenance Coatings" does not represent reasonably available control technology for most coatings used on metal parts and products. A standard of 340 g/l (air-dried) and 275 g/l (baked) is achievable for most coatings formulated to resist heavy abrasion, water immersion, chemicals, corrosion, temperature, electrical or solvent deterioration. We still believe that there are very few situations where a low-VOC alternative coating is not available. Again, we suggest that a provision be added to the rule allowing a source to demonstrate the need for a higher VOC coating and the unavailability of a lower VOC substitute.

6. In Section B.9, we strongly suggest that the term "Industrial Maintenance Coatings" be changed because it is used by industry to describe high performance coatings formulated for use as architectural coatings. Other terms generally recognized by industry to describe coatings having special performance properties are high performance chemical, high performance industrial or extreme performance coatings.
7. Section C.5: Emissions control devices and emissions collection equipment commonly have similar if not identical effects on emissions of both exempt and non-exempt compounds. Testing requirements would be simplified if performance requirements were specified in terms of all organics emissions rather than ROC since the need to quantify and deduct exempt emissions would be eliminated.
8. Section E. (Requirements - Closed Containers): We wish to reiterate our previous comments. We suggest that additional language be written to include the use of closed systems for the purging or cleaning of surface coatings from spray application equipment. The following is from Section 8-19-320.3 (Surface Preparation and Cleanup Solvent) of BAAQMD Regulation 8, Rule 19: "A person shall not use organic compounds for the cleanup of spray equipment including paint lines unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used".
9. Section H.3: It would be preferable to refer to Section 713 of 40CFR60 Subpart SSS, since this is the section of subpart SSS which addresses capture efficiency.

AIR RESOURCES BOARD

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SACRAMENTO, CA 95812NOV 07 1990
SB CO. APCD 

November 5, 1990

Doug A

Mr. James M. Ryerson
Air Pollution Control Officer
Santa Barbara County Air Pollution
Control District
26 Castilian Drive, B-23
Goleta, CA 93117

Dear Mr. Ryerson:

Proposed Amendments to Rule 330

The staff of the Air Resources Board has reviewed the proposed amendments to Rule 330, Surface Coating of Metal Parts and Products, that are scheduled for a public hearing to be held before your District Board on November 13, 1990.

We have concerns with the proposed amendments to Rule 330. Enclosed comment 1 discusses an element of the rule which is less effective than reasonably available control technology (RACT). We have also enclosed other comments and suggestions which we believe will improve the clarity and effectiveness of Rule 330. We recommend that you modify the proposed amendments to reflect our comments before presenting them to your Board for adoption.

If you have any questions regarding comments 1, 4, and 10, please contact Dean Simeroth, Stationary Source Division, at (916) 322-6020. For comments 2, 3, and 5 through 9, contact George Lew, Monitoring and Laboratory Division, at (916) 445-0657.

Thank you for keeping us informed during your rule development process.

Sincerely,

William W. Sylte
Chief Deputy Executive Officer

Enclosure

Date: 11/5/90

Enclosure

Air Resources Board Staff Comments on
Santa Barbara County APCD Proposed Rule 330

CRITICAL ISSUE

1. We wish to reiterate our comments made to the adopted rule, version dated July 10, 1990, regarding Section B.9. (Industrial Maintenance Coating Definition) and Section C.2. (Non-Powder Industrial Maintenance Coatings).

We still believe that a standard of 420 g/l (grams per liter) for the category of "Industrial Maintenance Coatings" does not represent reasonably available control technology for most coatings used on metal parts and products. A standard of 340 g/l (air-dried) and 275 g/l (baked) is achievable for most coatings formulated to resist heavy abrasion, water immersion, chemicals, corrosion, temperature, electrical or solvent deterioration. We still believe that there are very few situations where a low-VOC alternative coating is not available. Again, we suggest that a provision be added to the rule allowing a source to demonstrate the need for a higher VOC coating and the unavailability of a lower VOC substitute.

RULE IMPROVEMENT SUGGESTIONS

2. Section B: Three definitions should be added to this section: Reactive Organic Compounds, Volatile Organic Compounds (used in Section B.6 to define Ws) and solvent (used in Section H).
3. Section B.6: Typically this equation is written as " $(W_s - W_w - W_{es}) / (V_m - V_w - V_{es})$ ".

Unless a definition of volatile organic compound is provided (see comment above) which clearly exempts water, Ws should be redefined as "weight of volatile compounds" and Ww ("weight of water") should be subtracted from the numerator.

4. In Section B.9, we strongly suggest that the term "Industrial Maintenance Coatings" be changed because it is used by industry to describe high performance coatings formulated for use as architectural

coatings. Other terms generally recognized by industry to describe coatings having special performance properties are high performance chemical, high performance industrial or extreme performance coatings.

5. Section C.3: The solvent content of powdered materials is not subject to the same test methods as other coatings since those methods assume the material is a liquid. It is suggested that an equivalent limit be set in terms of grams of volatile material (without exemption of water or exempt solvents) per kilogram and test methods specified as described below.
6. Section C.5.a: The type of emissions to be controlled should be clearly specified. The control system should be required to control all organic emissions (not just ROC) to simplify testing requirements.
7. Section H.1: The test method specified makes no provision for determining non-water exempt compounds. It is suggested that ARB Method 432 be specified for determining non-water exempt compounds.

EPA Method 24 is not suitable for determining ROC in powdered materials. It would be appropriate to specify that percentage weight loss on drying at 110 C for one hour (or otherwise as actually heat-cured) be taken as a measure of volatile content in powdered coatings.

8. Section H.2: The test methods specified do not quantify exempt organic compounds. Otherwise, a supplementary test method such as ARB Method 432 should be specified for quantifying exempt organic compounds.
9. Section H.3: The reference should be to "40 CFR 60.713" since this is the portion of the regulation applicable to determination of capture efficiency. The remainder of subpart SSS is not pertinent.
10. Section E. (Requirements - Closed Containers): We wish to reiterate our previous comments. We suggest that additional language be written to include the use of closed systems for the purging or cleaning of surface coatings from spray application equipment. The following is from Section 8-19-320.3 (Surface Preparation and Cleanup Solvent) of BAAQMD Regulation 8, Rule 19: "A person shall not use organic compounds for the cleanup of spray equipment including paint lines unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used".

AIR RESOURCES BOARD

1102 Q STREET
P.O. BOX 2815
SACRAMENTO, CA 95812

SB Co. APCD



OCT 15 1990

October 11, 1990

RECEIVED

Mr. James M. Ryerson
Air Pollution Control Officer
Santa Barbara County Air Pollution
Control District
26 Castilian Drive, B-23
Goleta, CA 93117

Dear Mr. Ryerson:

Amended and Adopted Rules

The Staff of the Air Resources Board has reviewed the following rules which were amended or adopted by your District Board at a public hearing held on July 10, 1990.

Rule 102	Definitions (amended)
Rule 330	Surface Coating of Metal Parts and Products (amended)
Rule 337	Surface Coating of Aircraft or Aerospace Vehicle Parts and Products (new)

We also reviewed the definition of the term "Electrostatic Application" which is used in Rules 330 and 337 and which was amended by your District Board at a public hearing held on July 24, 1990.

We find the amendments to Rules 102, and 330 acceptable as adopted. However, we have enclosed comments with suggestions that we believe would improve the enforceability, effectiveness, and clarity of Rule 330. We will forward Rule 102 to the Environmental Protection Agency (EPA) as a revision to the State Implementation Plan (SIP), but we will delay submission of Rule 330 to EPA, as you requested in your August 30, 1990 letter to Ron Friesen.

We have concerns with the enforceability and emission control effectiveness of Rule 337 and have enclosed comments pertaining to those concerns (see comments 6 through 9). Also enclosed are other comments with suggestions for improvement of the clarity and effectiveness of the rule. Because we have determined that parts of Rule 337 are unenforceable and that the emission controls required by the rule do not represent reasonably available control technology, we are unable to recommend approval

Mr. James M. Ryerson

-2-

October 11, 1990

of the rule. We request that Rule 337 be withdrawn as a SIP submittal and that the changes we recommend in the enclosure be considered for incorporation in the rule as soon as possible.

Our records show that we did not receive proposed versions of Rules 330 and 337. We last received the rules on December 4, 1989. Those rules were drafts on which your District requested comments by January 29, 1990. We commented on the drafts in our January 29, 1990 letter to you. Some of the comments enclosed with this letter pertain to elements of Rule 337 that were revised after we reviewed the draft version of that rule. Because Rule 337 was not submitted and reviewed according to the ARB/CAPCOA protocols, we must now ask you to revisit this rule to correct some serious problems. We apologize for any inconvenience our comments may cause at this late stage, but are sure you agree to the importance of having effective and fully enforceable rules.

If you have any questions regarding comments 1 through 3, 7, 17, and 20, please contact Dean Simeroth, Stationary Source Division, at (916) 322-6020. For comments 4 through 6, 8 through 16, 18 and 19, contact Stephanie Trenck, Compliance Division, at (916) 323-8412.

Sincerely,



William W. Sylte
Chief Deputy Executive Officer

Enclosure

Mr. James M. Ryerson

-3-

bcc: Al Ronyecz, SBCAPCD
Colleen McKaughan, EPA
Catherine Witherspoon
Stephanie Trenck/Dean Saito
Dean Simeroth/Peggy Vanicek
George Lew
Dodie Weiner
Rule File 1311.10



Date: 10/11/90

Enclosure

Air Resources Board Staff Comments on
Santa Barbara County APCD Amended Rule 330 and Adopted Rule 337

Rule 330

RULE IMPROVEMENT SUGGESTIONS

1. We wish to reiterate our comments made on January 29, 1990 regarding Section B.9. (Industrial Maintenance Coating Definition) and Section C.2. (Non-Powder Industrial Maintenance Coatings).

We still believe that a standard of 420 g/l (grams per liter) for the category of "Industrial Maintenance Coatings" does not represent reasonably available control technology for most coatings used on metal parts and products. A standard of 340 g/l (air-dried) and 275 g/l (baked) is achievable for most coatings formulated to resist heavy abrasion, water immersion, chemicals, corrosion, temperature, electrical or solvent deterioration. We still believe that there are very few situations where a low-VOC alternative coating is not available. Again, we suggest that a provision be added to the rule allowing a source to demonstrate the need for a higher VOC coating and the unavailability of a lower VOC substitute.

In addition, we strongly suggest that the term "Industrial Maintenance Coatings" be changed because it is used by industry to describe high performance coatings formulated for use as architectural coatings. Other terms generally recognized by industry to describe coatings having special performance properties are high performance chemical, high performance industrial or extreme performance coatings.

2. Section D.8. (Transfer Efficiency): Since there is currently no test method to determine transfer efficiency (TE), a 65 percent TE is unenforceable. The District is reminded that the TE Committee of the TRG is addressing the unresolved issues.
3. Section E., Requirements (Closed Containers): We wish to reiterate our previous comments. We suggest that additional language be written to include the use of closed systems for the purging or cleaning of surface coatings from spray application equipment. The following is from

Section 8-19-320.3 (Surface Preparation and Cleanup Solvent) of BAAQMD Regulation 8, Rule 19: "A person shall not use organic compounds for the cleanup of spray equipment including paint lines unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used".

4. The District should adopt the current version of ASTM Test Method D 4457 for 1,1,1 Trichloroethane and Dichloromethane (Methylene Chloride) into Section H - Requirements Test Methods. To determine the ROC content of coatings, this test method could be needed to determine the quantity of exempt solvents contained in the coating.
5. Section I.7., Exemptions: States "provisions of Section C.2. shall not apply to coatings manufactured prior to July 24, 1990 [date of adoption] until January 1, 1992." This section allows the use of non-complying coatings for an additional six months beyond the compliance date provided for in Section J.3. The intention of Section I.7. is for the source to have the ability to use up current stock on hand, but it does not address the potential for persons to purchase excess quantities of paint prior to July 24, 1990 for use up to January 1992. ARB staff recommends the removal of Section I.7. and the use of a single effective date in order to simplify the determination of compliance for sources subject to this rule. Additionally, we believe that the District should adopt an earlier final compliance date than July 1, 1991 for these coatings. Industrial Maintenance Coatings as defined in this rule are equivalent to extreme performance coatings and are subject to the same limits in SCAQMD Rule 1107 since 1987.

Rule 337

CRITICAL ISSUES

6. In Section B.18, Definitions: The definition for sealant is too open-ended and is therefore unenforceable. Sealant is a generic term in the industry which can be used for coatings used as elastomeric coatings (sprayable sealants) and primers. Currently, SCAQMD Rule 1124 and Ventura Rule 74.13 are using the following definition: "Sealants are viscous semisolid materials that fill voids in order to seal out water, fuel, and other liquids and solids, and in some cases air movement and are applied by syringes, caulking guns, or spatulas". This definition is considered enforceable, although ARB staff would prefer to see a definition based on a physical parameter which is verifiable by an ASTM method. Lack of a suitable definition for "sealant" makes this section of the rule unenforceable.
7. Section C.1., Requirements, ROC Limits: The rule does not reflect the limits presented as RACT in the Final Phase III Rule Effectiveness Study.

Based on the final Phase III Rule Effectiveness Study of the aerospace coating industry conducted by EPA, etc., we recommend the following limits as RACT, effective date of rule adoption:

- a. Topcoat, 420 g/l.
- b. Adhesive bonding primer, 780 g/l.
- c. Fuel tank coating, 650 g/l.
- d. High temperature thermal flash resistant coating, delete.
- e. Radiation-effect coating, 600 g/l.
- f. Sealant bonding primer, 600 g/l.

Appendix K of the report presents compliant coatings found during the field inspections. The ranges for these coatings are presented below:

Topcoat	199-596 g/l
Fuel tank	484-623 g/l
Adhesive bonding primer	545-799 g/l
Electric-magnetic radiation	322-790 g/l

8. Section C.2.b, Requirements: This section is unenforceable because there is no acceptable test method available for determining the actual vapor pressure for mixed solvents. The vapor pressure committee of STMTAC is currently examining the problems with a laboratory determination for the vapor pressures of solvent blends. ARB staff recommends using an alternative parameter such as initial boiling point or a given VOC concentration. Currently, initial boiling point is used in Ventura's solvent cleaning rule and BAAQMD Rule 8-16 for solvent cleaning. ASTM D 1078-86 can be used to determine initial boiling point. Without a vapor pressure test method, this section of the rule is unenforceable.
9. The test methods discussed in Comment 8 need to be cited in Section H. Without test methods, Section C.2.b of the rule is not enforceable.

RULE IMPROVEMENT SUGGESTIONS

10. Section B.8, Definitions: Fire Insulation Coating, defines a coating used to provide a layer of insulation in the event of an aircraft or engine fire. As defined, this category can include ablative coatings, fire resistant coatings used for commercial aircraft interiors, and military fire resistant coatings. ARB staff recommends that the language used for this category be based on a parameter such as flame spread index, which can be tested by an ASTM Method. The parameter chosen should reflect the commercial and military requirements for fire-resistant coatings. An alternative would be to develop a procedure which identifies the applicable coatings which will be used in this category at each facility as discussed in Comment 6.

11. Section B.9, Definitions: Defines fuel tank coatings. Currently, SCAQMD Rule 1124 (adopted) and Ventura Rule 74.13 (draft) use the following language: "A coating applied to the interior of a fuel tank or to areas of an aircraft that are continuously wetted by fuel to protect it from corrosion and/or bacterial growth." ARB staff recommends that similar language be incorporated in the adopted rule to improve the enforceability of this section (see comment 14).
12. Section B.10, Definitions: The calculation for reactive organic compounds (ROC) content of a coating should be made on an "as applied" basis; this wording should be added to the definition.
13. Section B.15, Definitions: Defines a "pretreatment wash primer" as a coating which contains a small quantity of acid for surface etching. We suggest that for enhancing the clarity and enforceability of the rule, the "acid amount" in the definition should be defined and accompanied with a reference test method. We recommend using ASTM D 1639-83, for Acid Value of Organic Coating Materials. For your reference, the definition used by Bay Area AQMD for this term is given below:

"Pretreatment wash primer is a coating which contains a minimum of 0.5% acid by weight for surface etching and is applied directly to bare metal surfaces to provide corrosion resistance and adhesion."

14. VOC Content of Coatings: Section C.1, Requirements, contains many coating categories which require specific knowledge of the physical requirements which a coating must meet to qualify for the specific specialty category limit. Because of the diversity of the coatings which an inspector will come upon in the field, difficulties in enforcing the rule may result. During future revisions to this rule, we recommend including in the rule a requirement that coatings intended for use within a specialty coating category be identified prior to their use. This process would require that a list be submitted annually by the source. This list should include the coating manufacturer and serial number of each coating intended for use within each specialty coating category, and information to support that the specialty coating has been specified for the intended application. This information would be available to the inspector to assist in establishing the required ROC content for each coating used by the stationary source. Many facilities apply coatings only under a few coating categories. Listing these coatings would not be an undue burden on the source because their physical requirements do not change frequently. This process can be included with the recordkeeping requirement already required by the rule. Not only does this process ensure enforceability, but it also allows the District to collect information for some of the more specific categories.

ARB staff recommends that this requirement be established for low usage, technologically specific categories. We recommend that the following categories be subject to annual reporting requirements.

Electric or Radiation-Effect Coatings
Fire Insulation Coating
Fuel Tank Coating
High Temperature Coating
Rain Erosion Resistant Coating
Sealant

15. Section G.1, Recordkeeping: ARB staff recommends that mix ratio of components, including thinner, be included in the daily recordkeeping requirements. Mix ratios are required to improve the enforceability and for determining the VOC content of the coating applied. The VOC content given by the manufacturer is based on a fixed mix ratio. Mix ratio information is required to verify that the facility is mixing the coatings properly for the given VOC information.
16. Section G.2., Recordkeeping: We recommend adding the end use of the solvent (i.e. as a cleanup solvent, diluent, etc.) to the list of items to be recorded. This will facilitate future emissions inventory and reduction efforts by providing more detailed information on the distribution of emissions.
17. Section I.1., Exemptions: Based on the Final Phase III Report, we recommend that no more than 50 gallons total of such separate formulations be applied at a facility annually. In addition, specific criteria should be listed for the demonstration of lack of available coatings by the source, and whether such demonstration is required on a state, national, or worldwide basis.
18. Section I.4., Exemptions: This exempts applicable coatings from other rules, except Rules 317 and 322, and may result in a conflict of ROC standards for the coatings applied under the definition of aerospace. Some coatings which meet the ROC limit for the rule may not meet the limits set forth in the General Organic Solvent Rule, Rule 317. The Organic Solvent Rule bases its percentages on the total reactive solvent, where as ROC/liter for the rule is based on total reactive solvent plus solids. A high solids coating could exceed the Organic Solvent Rule but comply with the specific ROC limits of Rule 337. The District may want to include a statement to address this issue, ensuring the more stringent of the rules should apply, or specify which rules must be met.
19. Section I.5, Exemptions: "The provisions of Section C shall not apply to coatings manufactured prior to July 10, 1990..." appears to be in conflict with the Compliance Schedule, I.2. The intention is for the source to have the ability to use up current stock on hand, but it does not address the potential for persons to purchase excess quantities of paint prior to July 10, 1990 for use up to January 1, 1991. We recommend the removal of this section and use of a single effective date of July 10, 1990, or January 1, 1991, to maintain easier enforceability.

20. Section J.2., Compliance Schedule: Section G, Recordkeeping, should be effective as of the date of rule adoption, particularly if the source is seeking an exemption under Section I.1.