

Air Pollution Control Board
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COMPLIANCE ADVISORY

Notice of Amendments to Rule 67.3 Metal Parts and Products Coating Operations

On November 1, 1994, the Air Pollution Control District adopted amendments to Rule 67.3, an existing rule that regulates emissions of volatile organic compounds (VOC's) from metal parts and products coating operations. The primary purpose of the amendments was to correct deficiencies identified by the Environmental Protection Agency (EPA). The new amendments also provide more choices of materials and devices for surface preparation, cleaning and for cleaning of coating application equipment. Facilities using compliant coatings will also have the option of keeping monthly instead of daily records. In addition, the amended rule provides a limited exemption for facilities using Pretreatment Wash Primers.

The amended rule includes the following:

Applicability Clarifies the type of operations which are exempt from or subject

to metal parts and products coating operations.

Exemptions Adds an exemption for powder coating operations using less

than 0.5 gallons per day of cleaning or surface preparation solvent. Modifies the exemption for touch-up operations. Adds an exemption from general VOC limits for Pretreatment Wash Primers, provided that not more than 500 gallons per year is used at a facility. Provides an exemption for an existing facility

using High Performance Architectural Coatings.

Definitions Adds, deletes or amends certain definitions for clarification.

Application Clarifies the requirements for coating application equipment. Equipment

VOC Limits

Adds a new specialty category for Chemical Agent Resistant

Coating with a VOC limit of 420 grams per liter and revises the

VOC limit for High Performance Architectural Coatings.

Surface Preparation and Clean-up Adds an option for using solvents with high boiling point or low vapor pressure for surface preparation and cleanup operations. Adds additional optional methods for coating application equipment cleanup operations.

Control Equipment Clarifies the requirements for using add-on control equipment in lieu of complying with the rule's VOC limits.

Recordkeeping Requirements

Clarifies recordkeeping requirements and provides an option for keeping monthly or daily usage records of VOC-containing materials.

Test Methods

Updates test methods for determining compliance with the rule.

A copy of Rule 67.3 is enclosed. For more information, please call the District's Compliance Division at (619) 694-3340.