



Air Pollution Control Board
Brian P. Bilbray District 1
Dianne Jacob District 2
Pamela Slater District 3
Leon L. Williams District 4
John MacDonald District 5

Air Pollution Control Officer
R. J. Sommerville

DATE: November 1, 1994
TO: Air Pollution Control Board
SUBJECT: Adoption of Amendments to Rule 67.3 (Metal Parts and Products Coating Operations)

SUMMARY:

Rule 67.3 regulates volatile organic compound (VOC) emissions from coating operations on metal parts and products. It was last amended in 1990 to correct deficiencies identified by the Environmental Protection Agency (EPA). In May 1993, EPA issued a limited disapproval of Rule 67.3 citing an additional administrative deficiency it had not previously identified. EPA also noted that VOC limits for two types of specialty coatings (pretreatment wash primers and high performance architectural coatings) exceeded EPA standards reflecting Reasonably Available Control Technology (RACT). Therefore, the District is also required to provide documentation justifying deviations from the RACT standards. Failure to correct these deficiencies before December 1994 will result in automatic imposition of federal sanctions including a 2.0 to 1.0 emission offset ratio for new and modified major industrial sources (currently those emitting 25 tons per year of VOC's or more) and withholding up to \$75 million in federal transportation funds.

The proposed changes will correct the administrative deficiency identified by EPA, make clarifications, and update definitions, test methods and requirements for control equipment. They also provide industry with more choices of materials and devices for reducing VOC emissions from surface preparation and cleaning coating application equipment. Facilities using complying coatings will have the option of keeping monthly instead of daily records. The amendments also provide exemptions for pretreatment wash primers and high performance architectural coatings having VOC limits higher than the federal RACT standards. The District will submit appropriate documentation to EPA along with the amended rule justifying these exemptions.

The pending reclassification of San Diego County from a severe to serious ozone non-attainment area will have no effect on the applicability of Rule 67.3 because the federal Clean Air Act requires RACT for all VOC sources for which EPA has published standards.

Rule 67.3 affects approximately 250 companies coating metal parts and products. The revisions are mostly administrative in nature and will not result in any emission reductions.

The proposed changes are consistent with the Board's February 2, 1993 direction regarding implementing new or revised rules. They address federal Clean Air Act mandates.

Issue

Should the Board adopt amendments to Rule 67.3 (Metal Parts and Products Coating Operations) to correct deficiencies identified by Environmental Protection Agency and make other minor changes?

Recommendation

AIR POLLUTION CONTROL OFFICER

Adopt the resolution amending Rule 67.3 and make appropriate findings:

- (1) of necessity, authority, clarity, consistency, non-duplication and reference as required by Section 40727 of the State Health and Safety Code.
- (2) that amended Rule 67.3 will alleviate a problem and promote attainment of ambient air quality standards (Section 40001 of the State Health and Safety Code);
- (3) that the amendments will not significantly affect air quality or emissions limitations, and that an assessment of socioeconomic impacts is not required (Section 40728.5 of the State Health and Safety Code); and
- (4) that there is no reasonable possibility that the amended rule may have a significant effect on the environment, and that adoption of amended Rule 67.3 is categorically exempt from the provisions of the California Environmental Quality Act pursuant to California Code of Regulations, Title 14, Sections 15300 and 15308, as an action taken to assure the maintenance or protection of the environment and where the regulatory process involves procedures for protection of the environment.

Advisory Statement

The Air Pollution Control District Advisory Committee recommended adopting the proposed amendments to Rule 67.3 at its September 21, 1994 meeting.

Fiscal Impact

Adopting the proposed amendments will have no fiscal impact on the District.

Alternatives

Not adopt amendments to Rule 67.3. The EPA notified the District that a corrected Rule 67.3 must be submitted before December 1994, or sanctions (2.0 to 1.0 emission offset ratio for new and expanding major industrial sources and withholding up to \$75 million in federal transportation funds) will be imposed on San Diego County. Accordingly, this alternative is not recommended.

BACKGROUND:

Rule 67.3 was adopted to control VOC emissions from coating metal parts and products. Subsequently, EPA issued criteria for such rules and required amendments to correct deficiencies (e.g. absence of test methods and recordkeeping requirements, and deleting discretionary requirements). The deficiencies were corrected in 1990 in consultation with EPA. However, EPA has now identified another deficiency. The rule does not include a recordkeeping requirement to document continuous compliance when add-on control equipment is used. EPA also noted the VOC content standards for two specialty category coatings - pretreatment wash primers and high performance architectural coatings, exceed maximum allowable limits specified in the federal Control Technique Guideline (CTG) for metal parts and products which reflects RACT. As a result, EPA proposed a limited approval/limited disapproval of the rule and notified the District that failure to correct the deficiencies before December 1994 will result in automatic imposition of federal sanctions (2.0 to 1.0 emission offset ratio for new and expanding major industrial sources and withholding up to \$75 million in federal transportation funds) on San Diego County.

The proposed amendments correct the recordkeeping deficiency identified by EPA, and update definitions, test methods and control equipment requirements. They also allow industry more options in choosing materials and devices to meet the requirements for surface preparation and application equipment cleaning operations. Facilities using coatings meeting the requirements of the rule will have the option of keeping monthly instead of daily records.

The amendments also provide exemptions for the two specialty coating categories (pretreatment wash primers and high performance architectural coatings) identified by EPA as inconsistent with federal RACT requirements. An exemption for up to 500 gallons per year of pretreatment wash primers with a VOC content of 780 grams per liter or less is needed because currently available coatings meeting federal RACT requirements do not provide satisfactory performance in a number of applications. EPA has determined that the excess emissions from such an exemption can be considered insignificant if emissions from all exemptions in the rule represent less than 5% of the total allowable VOC emissions from this source category. The excess emissions from pretreatment wash primers and other exemptions currently in the rule are calculated to be less than two percent of total emissions from all metal parts and products coatings used in San Diego County. Documentation justifying this exemption will be submitted to EPA together with the rule changes.

The exemption for using high performance architectural coatings with a VOC content of 750 grams per liter or less applies to one small business in San Diego County. The company manufactures aluminum window frames and curtain walls for large commercial buildings. The majority of these products require custom color coatings designed to meet the requirements of specific architectural projects and the standards of the American Architectural Manufacturers Association. There are no technologically and economically feasible low VOC alternative coatings that can be used by this company and add-on control technology is too expensive. The District has determined that applying RACT requirements to this company is economically infeasible and will force the business to close. Accordingly, the District has prepared an Alternative RACT document which will be submitted to EPA as a source-specific revision to the State Implementation Plan together with the rule changes.

Section 40728.5 of the State Health and Safety Code requires the District to perform a socioeconomic impact assessment for new and revised rules and regulations significantly affecting air quality or emission limitations. The amendments to Rule 67.3 will not affect emission limitations. Therefore, a socioeconomic impact assessment is not required.

On February 2, 1993, the Air Pollution Control Board directed that, with the exception of a regulation requested by business or a regulation for which a socioeconomic impact assessment is not

SUBJECT: Adoption of Amendments to Rule 67.3

required, no new or revised regulation shall be implemented unless specifically required by federal or state law. Amending Rule 67.3 is required by the federal Clean Air Act and is consistent with the February 2, 1993 Board direction.

California Environmental Quality Act

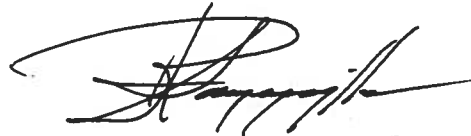
The California Environmental Quality Act requires an environmental review for certain actions. No significant adverse impacts on the environment have been suggested; no such impacts are reasonably possible. Adopting the proposed amendments to Rule 67.3 will not have a significant effect on the environment and is categorically exempt from the provisions of the California Environmental Quality Act pursuant to California Code of Regulations, Title 14, Sections 15300 and 15308, as an action taken to assure the maintenance or protection of the environment where the regulatory process involves procedures for protection of the environment.

A public workshop on proposed Rule 67.3 was held on June 14, 1994. The workshop report is attached.

Concurrence:

Respectfully submitted,

DAVID E. JANSSEN
Chief Administrative Officer



R. J. SOMMERVILLE
Air Pollution Control Officer

**AIR POLLUTION CONTROL BOARD
AGENDA ITEM
INFORMATION SHEET**

SUBJECT: Adoption of Amendments to Rule 67.3 (Metal Container, Metal Closure and Metal Coil Coating Operations)

SUPV DIST.: All

COUNTY COUNSEL APPROVAL: Form and Legality Yes N/A
 Standard Form Ordinance Resolution

TD 10/12/94

AUDITOR APPROVAL: N/A Yes **4 VOTES:** Yes No

FINANCIAL MANAGEMENT REVIEW: Yes No

CONTRACT REVIEW PANEL: Approved _____ N/A

CONTRACT NUMBER(S): N/A

PREVIOUS RELEVANT BOARD ACTION:

BOARD POLICIES APPLICABLE:

CITIZEN COMMITTEE STATEMENT: The Air Pollution Control District Advisory Committee recommended adoption of proposed Rule 67.3 at its September 21, 1994 meeting.

CONCURRENCES: N/A

ORIGINATING DEPARTMENT: Air Pollution Control District County of San Diego

CONTACT PERSON: Richard J. Smith, Deputy Director 750-3303 MS: 0-176



R.J. SOMMERVILLE
DEPARTMENT AUTHORIZED REPRESENTATIVE

NOVEMBER 1, 1994
MEETING DATE

Resolution No. 94-445
Re Rules and Regulations of the
Air Pollution Control District)
of San Diego County)

TUESDAY, NOVEMBER 1, 1994

**RESOLUTION AMENDING RULE 67.3
OF REGULATION IV
OF THE RULES AND REGULATIONS OF THE
SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT**

On motion of Member MacDonald seconded by Member Jacob the following resolution is adopted:

WHEREAS, the San Diego County Air Pollution Control Board, pursuant to Section 40702 of the Health and Safety Code, adopted Rules and Regulations of the Air Pollution Control District of San Diego County; and

WHEREAS, said Board now desires to amend said Rules and Regulations; and

WHEREAS, notice has been given and a public hearing has been had relating to the amendment of said Rules and Regulations pursuant to Section 40725 of the Health and Safety Code.

NOW THEREFORE IT IS RESOLVED AND ORDERED by the San Diego County Air Pollution Control Board that the Rules and Regulations of the Air Pollution Control District of San Diego County be and hereby are amended as follows:

Amendments are to read as follows:

RULE 67.3 METAL PARTS AND PRODUCTS COATING OPERATIONS

(a) APPLICABILITY

(1) Except as otherwise provided in Section (b), this rule is applicable to coating operations for metal parts and products.

(2) Any coating operation subject to the requirements of Rules 67.0, 67.4, 67.9 or 67.18 shall not be subject to this rule.

(3) Rule 66 shall not apply to any coating operation which is subject to this rule.

(4) Equipment used for cleaning and/or surface preparation of metal parts and products and also used for cleaning of coating application equipment for metal parts and products shall be subject to the applicable requirements of both Rules 67.3 and 67.6.

(b) EXEMPTIONS

Any person claiming an exemption pursuant to Subsections (b)(1)(i), (b)(1)(ii), (b)(2)(i) and/or (b)(3)(i) shall maintain monthly purchase and daily usage records of coatings and/or cleaning materials, as applicable, containing volatile organic compounds (VOC's) in order to

substantiate the applicability of the claimed exemption. These records shall be maintained on site for three years and made available to the District upon request.

(1) The provisions of Sections (d), (e) and (f) shall not apply to the following:

(i) Any coating operation where 20 gallons or less of coatings are applied per consecutive 12-month period.

(ii) Any powder coating operation which uses less than 0.5 gallons per day of any surface preparation or cleaning material containing volatile organic compounds.

(iii) Coatings applied to motor vehicles, excluding the application of coatings to component parts or accessories during original manufacture.

(iv) Coatings applied using non-refillable handheld aerosol spray containers.

(v) Coatings applied to metal surfaces for the specific purpose of protecting the metal substrate from corrosive attack by storage battery electrolytes.

(vi) The application of the following coatings:

(A) Cathode coatings.

(B) Chemical milling maskants.

(C) Magnetic tape storage disks coatings.

(D) Safety indicating coatings.

(E) Solid film lubricants.

(F) Stencil coatings.

(G) Wet fastener installation coatings.

(2) The provisions of Subsection (d)(1) shall not apply to the following:

(i) Any coating operation which applies one gallon or less of coatings during each day of operation.

(ii) Any coatings that are applied by the use of air brushes with a coating capacity of two ounces (59.1 ml) or less.

(iii) Any coatings that are applied for touch-up operations.

(3) The provisions of Subsections (d)(2) and (d)(3) shall not apply to the following:

(i) Pretreatment wash primers with a VOC content, as applied, of less than 780 grams of VOC per liter of coating, less water and exempt compounds, provided that not more than 500 gallons of all pretreatment wash primers are used at a stationary source in each consecutive 12-month period.

(ii) High performance architectural coatings with a VOC content, as applied, of less than 750 grams of VOC per liter of coating, less water and exempt

compounds, used at a stationary source which has continuously maintained a District Permit to Operate for each high performance architectural coating operation since (*one year prior to date of adoption*).

(c) **DEFINITIONS**

For the purposes of this rule, the following definitions shall apply:

(1) **"Adhesive"** means a substance applied to a metal surface for the sole purpose of bonding the metal surface with another metal or non-metal surface by attachment.

(2) **"Air-Dried Coating"** means any coating which is not heated above 90° C (194° F) for the purpose of curing or drying.

(3) **"Baked Coating"** means any coating which is cured or dried in an oven where the oven air temperature exceeds 90° C (194° F).

(4) **"Cathode Coating"** means a functional coating applied to an electrical cathode.

(5) **"Chemical Agent Resistant Coating (CARC)"** means a coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents and to conceal the equipment from detection.

(6) **"Chemical Milling Maskant"** means a coating applied directly to a metal part to protect surface areas during chemical milling, anodizing, aging, bonding, plating, etching, or other chemical surface operations.

(7) **"Coating"** means a material containing more than 20 grams per liter of VOC as applied, less water and exempt compounds, which can be applied as a thin layer to a substrate, and which dries or cures to form a continuous solid film, including but not limited to any paint, primer, varnish, stain, lacquer, enamel, shellac, sealant, or maskant, and excluding any adhesives, or preservative oils.

(8) **"Coating Operation"** means all steps involved in the application, drying and/or curing of surface coatings, including touch-up operations, and associated surface preparation and equipment cleaning.

(9) **"Dip Coat"** means a coating application method accomplished by dipping an object into coating.

(10) **"Electrostatic Spray"** means a coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.

(11) **"Exempt Compound"** means any of the following compounds or classes of compounds: 1,1,1-trichloroethane, methylene chloride (dichloromethane), trichlorofluoromethane (CFC-11), dichlorodifluoromethane (CFC-12), trifluoromethane (HFC-23), trichlorotrifluoroethane (CFC-113), dichlorotetrafluoroethane (CFC-114), chloropentafluoroethane (CFC-115), chlorodifluoromethane (HCFC-22), dichlorotrifluoroethane (HCFC-123), dichlorofluoroethane (HCFC-141b), 1,1,1,2-tetrafluoroethane (HFC-134a), 1,1,2,2-tetrafluoroethane (HFC-134), chlorodifluoroethane (HCFC-142b), 2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124), pentafluoroethane (HFC-125), 1,1,1-trifluoroethane (HFC-143a), 1,1-difluoroethane (HFC-152a), and the following four classes of perfluorocarbon (PFC) compounds:

- (i) Cyclic, branched, or linear, completely fluorinated alkanes;
 - (ii) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;
 - (iii) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and
 - (iv) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.
- (12) **"Flow Coat"** means a coating application method accomplished by flowing a stream of coating over an object.
- (13) **"Hand Application Method"** means a coating application method accomplished by applying a coating by manually held, non-mechanically operated equipment. Such equipment includes paint brushes, hand rollers, rags and sponges.
- (14) **"Heat-Resistant Coating"** means any coating which during normal use must withstand a temperature of at least 204.4°C (400°F).
- (15) **"High Gloss Coating"** means any coating which achieves at least 75% reflectance on a 60° meter.
- (16) **"High Performance Architectural Coating"** means a coating used to protect architectural subsections which meets the specifications of the Architectural Aluminum Manufacturers Association publication AAMA 605.2-1992.
- (17) **"High-Volume Low-Pressure (HVL) Spray"** means a coating application method which uses pressurized air at a permanent pressure between 0.1 and 10.0 psig, not to exceed 10 psig, measured at the air cap of the coating application system.
- (18) **"Magnetic Tape Storage Disk Coating"** means a coating used on a metal disk which stores data magnetically.
- (19) **"Metallic Topcoat"** means a coating which contains more than 5 grams of elemental metal particles per liter of coating, as applied.
- (20) **"Motor Vehicle"** has the same meaning as defined in Section 415 of the Vehicle Code.
- (21) **"Powder Coating"** means any material applied as a dry (without a carrier) finely divided solid which, when melted and fused, adheres to the substrate as a paint film.
- (22) **"Preservative Oils "** means any material which does not contain solids, and is applied to prevent corrosion or provide lubrication or both.
- (23) **"Pretreatment Wash Primer"** means any coating which contains a minimum of 0.5 percent acid by weight and which is applied directly to bare metal surfaces and is necessary to provide surface etching and required adhesion for subsequent coatings.
- (24) **"Primer"** means a coating applied for purposes of corrosion prevention, protection from the environment, functional fluid resistance and/or adhesion of subsequent

coatings. A primer would also include a coating which is formulated to be used as a primer but which, in a specific application, is used as an initial and final coating without subsequent application of a topcoat.

(25) **"Roll Coat"** means a coating application method accomplished by rolling a coating onto a flat surface using a roll applicator.

(26) **"Safety Indicating Coating"** means a coating applied to pressurized air cylinders which undergoes a wide color change when exposed to a high temperature.

(27) **"Solar Absorbent Coating"** means a coating formulated for the sole purpose of absorbing solar radiation to produce heat.

(28) **"Solid Film Lubricant"** means a thin film coating of an organic binder system containing as its chief pigment material one or more of the following: molybdenum disulfide, graphite, polytetrafluoroethylene or other solids that act as a dry lubricant between meeting surfaces.

(29) **"Stationary Source"** has the same meaning as defined in Rule 20.1.

(30) **"Stencil Coating"** means any ink or coating which is rolled, brushed or applied by air brush or non-refillable handheld aerosol spray containers onto a template or stamp in order to add identifying letters and/or numbers to metal parts and products.

(31) **"Touch-up Operation"** means that portion of the coating operation which is incidental to the main coating process but necessary to cover minor imperfections or minor mechanical damage incurred prior to intended use, or to achieve coverage as required.

(32) **"Transfer Efficiency"** means the ratio of the weight of coating solids adhering to the part being coated to the weight of coating solids used in the application process expressed as a percentage.

(33) **"Volatile Organic Compounds (VOC)"** means any volatile compound of carbon, which may be emitted to the atmosphere during operations or activities subject to this rule, except methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, ammonium carbonate, and exempt compounds.

(34) **"VOC Content Per Volume of Coating, Less Water and Exempt Compounds"** means the weight of VOC per combined volume of VOC and coating solids and is calculated by the following equation:

$$C_{\text{voc}} = (W_s - W_w - W_{\text{es}}) / (V_m - V_w - V_{\text{es}})$$

where:

- C_{voc} = VOC content less water and exempt compounds
- W_s = weight of volatile compounds including water and exempt compounds
- W_w = weight of water
- W_{es} = weight of exempt compounds
- V_m = volume of material including water and exempt compounds
- V_w = volume of water

V_{es} = volume of exempt compounds

(35) "VOC Content Per Volume of Material" means the weight of VOC per volume of material and is calculated by the following equation:

$$C_{m\text{voc}} = (W_s - W_w - W_{es}) / V_m$$

where:

$C_{m\text{voc}}$ = VOC content

W_s = weight of volatile compounds including water and exempt compounds

W_w = weight of water

W_{es} = weight of exempt compounds

V_m = volume of material including water and exempt compounds

(36) "Wet Fastener Installation Coating" means a primer or sealant applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured.

(d) STANDARDS

(1) Application Equipment

Except as provided in Subsection (b)(2), no coatings shall be applied unless one of the following application methods is used:

(i) Electrostatic spray application, or

(ii) Flow coat application, or

(iii) Dip coat application, or

(iv) High-volume low-pressure (HVLP) spray application, or

(v) Roll coat application, or

(vi) Hand application methods, or

(vii) Other coating application methods that are demonstrated to have a transfer efficiency at least equal to one of the above application methods, and which are used in such a manner that the parameters under which they were tested are permanent features of the method. Such coating application methods shall be approved in writing prior to use by the Air Pollution Control Officer.

(2) VOC Limits

Except as provided in Subsection (d)(3), a person shall not apply any coating with a VOC content in excess of the following limits expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

Air-Dried Coatings	340
Baked Coatings	275

(3) VOC Limits for Specialty Coatings

A person shall not apply any specialty coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

<u>CATEGORY</u>	<u>AIR-DRIED</u>	<u>BAKED</u>
Chemical Agent Resistant	420	420
Heat Resistant	420	360
High Gloss	420	360
High Performance Architectural	420	420
Metallic Topcoat	420	360
Pretreatment Wash Primer	420	420
Solar Absorbent	420	360

The requirements of Subsections (d)(2) and (d)(3) may be met using an Alternative Emission Control Plan (AECPP) that has been approved pursuant to Rule 67.1.

(4) Surface Preparation and Cleanup Solvents

Except as provided in Subsection (d)(5), a person shall not use VOC-containing materials for surface preparation or cleanup unless:

- (i) The material contains 200 grams or less of VOC per liter of material; or
- (ii) The material has an initial boiling point of 190° C (374° F) or greater; or
- (iii) The material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F).

(5) Cleaning of Application Equipment

A person shall not use VOC containing materials for the cleaning of application equipment used in operations subject to this rule unless:

- (i) The cleaning material contains 200 grams or less of VOC per liter of material; or
- (ii) The cleaning material has an initial boiling point of 190° C (374° F) or greater; or
- (iii) The cleaning material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F); or
- (iv) The cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or
- (v) The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or

(vi) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or

(vii) Other application equipment cleaning methods that are demonstrated to be as effective as any of the equipment described above in minimizing the emissions of VOC to the atmosphere, provided that the device has been tested and approved prior to use by the Air Pollution Control Officer.

(6) No person shall require for use or specify the application of a coating subject to this rule if such use or application results in a violation of this rule. This prohibition shall apply to all written or oral contracts under the terms of which any coating is applied to any metal part or product at any location within San Diego County.

(7) Emission reduction credits that would otherwise be approvable pursuant to District Rule 26.0 et seq., shall not be granted for that portion of the emission reductions attributable to VOC contents of coatings which are subject to this rule, greater than 420 grams per liter or the applicable VOC content limit of this rule, whichever is less.

(e) CONTROL EQUIPMENT

(1) In lieu of complying with the provisions of Subsections (d)(2), (d)(3), (d)(4), and/or (d)(5) of this rule, a person may use an air pollution control system which:

(i) Has been installed in accordance with an Authority to Construct; and

(ii) Includes an emission collection system which captures organic gaseous emissions, including emissions associated with applicable coating, equipment cleaning, and surface preparation operations, and transports the captured emissions to an air pollution control device; and

(iii) Has a combined emissions capture and control device efficiency of at least 85 percent by weight.

(2) A person electing to use control equipment pursuant to Section (e)(1) shall submit to the Air Pollution Control Officer for approval an Operation and Maintenance plan for the proposed emission control device and emission collection system and receive approval prior to operation of the control equipment. Thereafter, the plan can be modified, with Air Pollution Control Officer approval, as necessary to ensure compliance. Such plan shall:

(i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with Subsection (e)(1)(iii), such as temperature, pressure, and/or flow rate; and

(ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding the key system operating parameters.

(3) Upon approval of the Air Pollution Control Officer, a person subject to the requirements of Section (e) shall implement the Operation and Maintenance plan and shall comply with the provisions of the approved plan thereafter.

(f) RECORDKEEPING

All records shall be retained on-site for at least three years, and shall be made available to the District upon request.

(1) Any person subject to the provisions of Subsections (d)(2), (d)(3), (d)(4) and/or (d)(5) of this rule shall maintain records in accordance with the following:

(i) Maintain a current list of coatings, surface preparation, and cleaning materials in use which provides all of the VOC data necessary to evaluate compliance, including but not limited to:

(A) manufacturer name and identification for each coating or coating component for multi-component coatings, (this includes any components such as bases, catalysts, thinners or reducers, when supplied in separate containers), surface preparation and cleaning material; and

(B) mix ratio of components; and

(C) VOC content, vapor pressure and/or initial boiling point, as applicable, for each coating, or coating component for multi-component coatings, surface preparation and cleaning material.

(ii) Maintain current documentation to demonstrate applicability of any specialty coating category pursuant to Subsection (d)(3) of this rule.

(iii) Maintain daily or monthly records of the amount of each coating or each coating component for multi-component coatings used. Maintain records of material additions to dip tanks used for dip coating applications.

(iv) Maintain daily or monthly records showing the amounts of each surface preparation and cleaning material used.

(v) Maintain records of the actual oven drying temperature, if applicable.

(2) Any person using control equipment pursuant to Section (e) of this rule shall:

(i) Maintain records in accordance with Subsection (f)(1); and

(ii) For all coating, cleaning, and/or surface preparation materials not in compliance with Subsections (d)(2), (d)(3), (d)(4), or (d)(5) of this rule, maintain daily records of the amount of each coating or each coating component for multi-component coatings, surface preparation and cleaning material used; and

(iii) Maintain daily records of key system operating parameters as approved in the Operation and Maintenance plan. Such records shall be sufficient to document continuous compliance with Subsection (e)(1)(iii) during periods of emission producing activities.

(g) TEST METHODS

(1) Measurement of heat resistance referenced in Subsection (c)(14) of this rule shall be conducted in accordance with ASTM Standard Test Method D2485-91.

(2) Measurement of coating reflectance referenced in Subsection (c)(15) of this rule shall be conducted in accordance with ASTM Standard Test Method D523-89.

(3) Measurement of elemental metal content referenced in Subsection (c)(19) of this rule shall be conducted and reported in accordance with the South Coast Air Quality Management District's Spectrographic Method 311.

(4) Measurement of pretreatment wash primer acid content referenced in Subsection (c)(23) of this rule shall be conducted in accordance with ASTM Standard Test Method D1613-91.

(5) Perfluorocarbon (PFC) compounds shall be assumed to be absent from a coating, cleaning, or surface preparation material subject to this rule unless a manufacturer of the material or a facility operator identifies the specific individual compound(s) and the amount(s) present in the material and provides an EPA and ARB approved test method which can be used to quantify the specific compounds.

(6) Measurements of transfer efficiency subject to Subsection (d)(1)(vii) of this rule shall be conducted in accordance with the South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" as it exists on (*date of adoption*).

(7) Measurement of the VOC content of coatings, surface preparation and cleaning materials subject to Subsections (d)(2), (d)(3), (d)(4)(i) or (d)(5)(i) of this rule shall be conducted in accordance with EPA Test Method 24 (40 CFR 60, Appendix A) as it exists on (*date of adoption*).

(8) Measurement of the VOC content of ultraviolet radiation-cured coatings subject to Subsections (d)(2) or (d)(3) of this rule shall be conducted in accordance with ASTM Standard Test Method D5403-93. Measurement of the water content and exempt solvent content, if applicable, shall be conducted and reported in accordance with ASTM Standard Test Methods D 3792-91 and D 4457-85.

(9) Measurement of the initial boiling point of cleaning and surface preparation materials subject to Subsection (d)(4)(ii) and/or (d)(5)(ii) of this rule shall be conducted in accordance with ASTM Standard Test Method D1078-86 for distillation range of volatile organic liquids.

(10) Calculation of total VOC vapor pressure for materials subject to Subsection (d)(4)(iii) and/or (d)(5)(iii) of this rule shall be conducted in accordance with the District's "Procedures for Estimating the Vapor Pressure of VOC Mixtures" as it exists on (*date of adoption*). If the vapor pressure of the liquid mixture, as calculated by this procedure, exceeds the limits specified in Subsection (d)(4)(iii) and/or (d)(5)(iii), the vapor pressure shall be determined in accordance with ASTM Standard Test Method D2879-86, Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM Standard Test Methods D3792-91 and D4457-85 and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM Test Method D2879-86 shall be corrected for partial pressure of water and exempt compounds.

(11) Measurement of solvent losses from alternative application cleaning equipment subject to Subsection (d)(5)(vii) shall be conducted and reported in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" as it exists on (*date of adoption*).

(12) Measurement of control device efficiency subject to Subsection (e)(1) of this rule shall be conducted in accordance with EPA Methods 18 and/or 25A (40 CFR 60) as they exist on (*date of adoption*) and in accordance with a protocol approved by the Air Pollution Control Officer.

(13) Measurement of the emission collection system capture efficiency subject to Subsection (e)(1) of this rule shall be conducted using a protocol approved by the Air Pollution Control Officer. Subsequent to the initial compliance demonstration period, applicable key system operating parameters, as approved by the Air Pollution Control Officer, shall be used as indirect verification that capture efficiency has not diminished.

IT IS FURTHER RESOLVED AND ORDERED that the subject amendments to Rule 67.3 of Regulation IV, shall take effect upon adoption.

PASSED AND ADOPTED by the Air Pollution Control Board of the San Diego County Air Pollution Control District, State of California, this first day of November, 1994 by the following votes:

AYES: Bilbray, Jacob, Slater, MacDonald
NOES: None
ABSENT: Williams

APPROVED AS TO FORM AND LEGALITY
COUNTY COUNSEL

BY *W. Dutton*
DEPUTY

This is a true certified copy of the original document on file or of record in my office. It bears the seal of the County of San Diego and signature of the Clerk of the Board of Supervisors, imprinted in purple ink.



Thomas J. Pastuszka
Clerk of the Board, San Diego County, California

Date: 11/1/94 By Deputy: *J. Zometa*

11/1/94 (APCB 1)

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

PROPOSED AMENDMENTS TO RULE 67.3

CHANGE COPY

Amendments are to read as follows:

RULE 67.3 ~~COATING OF METAL PARTS AND PRODUCTS~~ COATING OPERATIONS

(a) APPLICABILITY

(1) Except as otherwise provided in Section (b), this rule is applicable to the surface coating of metal parts and products.

(2) Any coating operation subject to the requirements of Rules 67.0, 67.4, 67.9 or 67.18 shall not be subject to this rule.

(3) Rule 66 shall not apply to any coating operation which is subject to this rule.

(4) Equipment used for cleaning and/or surface preparation of metal parts and products and also used for cleaning of coating application equipment for metal parts and products shall be subject to the applicable requirements of both Rules 67.3 and 67.6.

(b) EXEMPTIONS

Any person claiming an exemption pursuant to Subsections (b)(1)(i), (b)(1)(ii), (b)(2)(i) and/or (b)(3)(i) shall maintain monthly purchase and daily usage records of coatings and/or cleaning materials, as applicable, containing volatile organic compounds (VOC's) in order to substantiate the applicability of the claimed exemption. These records shall be maintained on site for three years and made available to the District upon request.

(1) The provisions of Sections (d), (e) and (f) shall not apply to the following:

(i) Any coating operation where 20 gallons or less of coatings are applied per consecutive 12-month period. Any coating line where twenty gallons per year of coating are applied. It shall be the responsibility of any person claiming this exemption to maintain daily records showing coating usage is twenty gallons per year or less in order for the District to determine this exemption.

(2) Any coating line subject to the requirements of Rules 67.4 or 67.9 or 67.18.

(ii) Any powder coating operation which uses less than 0.5 gallons per day of any surface preparation or cleaning material containing volatile organic compounds.

(iii) Coatings applied to motor vehicles coatings, excluding the application of coatings to component parts or accessories during original manufacture.

(iv) Coatings applied using non-refillable handheld aerosol spray containers.

~~(xii)~~(v) Coatings applied to metal surfaces for the specific purpose of protecting the metal substrate from corrosive attack by storage battery electrolytes.

~~(3)~~(vi) The application of the following coatings:

~~(vii)~~(A) Cathode coatings.

~~(v)~~(B) Chemical milling maskants.

~~(x)~~(C) Magnetic tape storage disks coatings.

~~(ix)~~(D) Safety indicating coatings.

~~(viii)~~(E) Solid film lubricants.

~~(ii)~~(F) Stencil coatings using a template.

~~(xiii)~~(G) Wet fastener installation coatings. Primers applied to wet installed metal fasteners provided application of primers is done by either dip coating, flow coating or brushing.

~~(iii)~~ Coatings used for touch-up and repair provided daily coating usage does not exceed one quart.

~~(iv)~~ Architectural coatings, applied to permanent stationary structures.

~~(vi)~~ Adhesive coatings.

~~(xiv)~~ Inks or coatings used to form letters or numbers for purposes of identifying metal parts or products provided application is done by brushing, stamping, or by non-refillable handheld aerosol spray containers.

(2) The provisions of Subsection (d)(1) shall not apply to the following:

(i) Any coating operation which applies one gallon or less of coatings during each day of operation.

(ii) Any coatings that are applied by the use of air brushes with a coating capacity of two ounces (59.1 ml) or less.

(iii) Any coatings that are applied for touch-up operations.

(3) The provisions of Subsections (d)(2) and (d)(3) shall not apply to the following:

(i) Pretreatment wash primers with a VOC content, as applied, of less than 780 grams of VOC per liter of coating, less water and exempt compounds, provided that not more than 500 gallons of all pretreatment wash primers are used at a stationary source in each consecutive 12-month period.

(ii) High performance architectural coatings with a VOC content, as applied, of less than 750 grams of VOC per liter of coating, less water and exempt compounds, used at a stationary source which has continuously maintained a District Permit to Operate for each high performance architectural coating operation since (one year prior to date of adoption).

(c) **DEFINITIONS**

For the purposes of this rule, the following definitions shall apply:

- (1) **"Adhesive"** means a substance applied to a metal surface for the sole purpose of bonding the metal surface with another metal or non-metal surface by attachment.
- (2) **"Air-d Dried Coating"** means any coating which is ~~dried or cured at ambient temperature, and forced air dried coatings.~~ not heated above 90° C (194° F) for the purpose of curing or drying.
- ~~(3)~~ **"Architectural Coating"** ~~has the same meaning as defined in Rule 67.0.~~
- ~~(4)~~(3) **"Baked Coating"** means any coating which is heated above 90° C (194° F) in order to cure or dry the coating. cured or dried in an oven where the oven air temperature exceeds 90° C (194° F).
- ~~(5)~~ **"Brush Coat"** ~~means a coating application method accomplished by applying a coating with a brush.~~
- ~~(6)~~(4) **"Cathode Coating"** means a functional coating applied to an electrical cathode.
- (5) **"Chemical Agent Resistant Coating (CARC)"** means a coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents and to conceal the equipment from detection.
- ~~(7)~~(6) **"Chemical Milling Maskant"** means a coating applied directly to a metal part to protect surface areas during chemical milling, anodizing, aging, bonding, plating, etching, or other chemical surface operations.
- (7) **"Coating"** means a material containing more than 20 grams per liter of VOC as applied, less water and exempt compounds, which can be applied as a thin layer to a substrate, and which dries or cures to form a continuous solid film, including but not limited to any paint, primer, varnish, stain, lacquer, enamel, shellac, sealant, or maskant, and excluding any adhesives, or preservative oils.
- ~~(8)~~ **"Coating Line"** ~~means the equipment required to apply, dry, cure or bake coatings and associated flashoff areas which is operated in an uninterrupted series in a metal parts and products operation.~~
- (8) **"Coating Operation"** means all steps involved in the application, drying and/or curing of surface coatings, including touch-up operations, and associated surface preparation and equipment cleaning.
- (9) **"Dip Coat"** means a coating application method accomplished by dipping an object into coating.
- (10) **"Electrostatic Spray"** means a coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.
- (11) **"Exempt Compound"** is means any of the following compounds or classes of compounds: 1,1,1-trichloroethane, methylene chloride (dichloromethane), trichloroflu-

oromethane (CFC-11), dichlorodifluoromethane (CFC-12), trifluoromethane (HFC-23), trichlorotrifluoroethane (CFC-113), dichlorotetrafluoroethane (CFC-114), chloropentafluoroethane (CFC-115), chlorodifluoromethane (HCFC-22), dichlorotrifluoroethane (HCFC-123), dichlorofluoroethane (HCFC-141b), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1,2,2-tetrafluoroethane (HFC-134), chlorodifluoroethane (HCFC-142b), 2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124), pentafluoroethane (HFC-125), 1,1,1-trifluoroethane (HFC-143a), 1,1-difluoroethane (HFC-152a), and the following four classes of perfluorocarbon (PFC) compounds:

(i) Cyclic, branched, or linear, completely fluorinated alkanes;

(ii) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations;

(iii) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations; and

(iv) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

~~(13)~~(12) **"Flow Coat"** means a coating application method accomplished by flowing a stream of coating over an object.

~~(14)~~ **"~~Forced Air-Dried Coating~~"** means ~~a coating which is heated to a temperature less than or equal to 90° C (194° F) in order to cure or dry the coating.~~

(13) **"Hand Application Method"** means a coating application method accomplished by applying a coating by manually held, non-mechanically operated equipment. Such equipment includes paint brushes, hand rollers, rags and sponges.

~~(15)~~(14) **"Heat-Resistant Coating"** means any coating which during normal use used on surfaces where the coating must withstand a temperatures of greater than at least 204.4°C (400°F), as demonstrated when tested in accordance with ASTM Method D-2485.

~~(12)~~(15) **"Extreme High Gloss Coating"** means any non-metallic coating which achieves has a reflectance of at least 75% percent reflectance on a 60° meter when tested in accordance with ASTM Method D-523 (1980).

(16) **"High Performance Architectural Coating"** means a coating used to protect architectural subsections which meets the specifications of the Architectural Aluminum Manufacturers Association publication AAMA 605.2-198092.

(17) **"High-Volume Low-Pressure (HVLP) Spray"** means a coating application method which uses pressurized air at a permanent pressure between 0.1 and 10.0 psig, not to exceed 10 psig, measured at the air cap of the coating application system, ~~and a permanent liquid coating pressure of not more than 50 psig.~~

(18) **"Integral Fuel Tank Coating"** means ~~a coating applied to the interior surfaces of a fuel tank by means of a fill and drain application method and which is formulated to resist the corrosive action of the fuel and moisture.~~

~~(19)~~(18) **"Magnetic Tape Storage Disk Coating"** means a coating used on a metal disk which stores data magnetically.

(20)(19) **"Metallic Topcoat"** means a coating which contains more than 5 grams of elemental metal particles per liter of coating, as applied, ~~and is applied to surfaces which require heat reflectivity or protection from high temperatures (400° F) or above.~~

(21)(20) **"Motor Vehicle"** has the same meaning as defined in Section 415 of the Vehicle Code.

(21) **"Powder Coating"** means any material applied as a dry (without a carrier) finely divided solid which, when melted and fused, adheres to the substrate as a paint film.

(22) **"Preservative Oils "** means any material which does not contain solids, and is applied to prevent corrosion or provide lubrication or both.

(22)(23) **"Pretreatment Coating (Wash Primer)"** means any coating which contains a minimum of 0.5 percent acid by weight and which is applied directly to bare metal surfaces and is necessary to provide surface etching and required adhesion for subsequent coatings.

(23)(24) **"Primer"** means a coating applied for purposes of corrosion prevention, protection from the environment, functional fluid resistance and/or adhesion of subsequent coatings. A primer would also include a coating which is formulated to be used as a primer but which, in a specific application, is used as an initial and final coating without subsequent application of a topcoat.

(24) **"Repair"** ~~means recoating portions of a previously coated product due to mechanical damage to the coating following normal painting operations.~~

(25) **"Roll Coat"** means a coating application method accomplished by rolling a coating onto a flat surface using a roll applicator.

(26) **"Safety Indicating Coating"** means a coating applied to pressurized air cylinders which and is formulated to undergoes a wide color change when exposed to a high temperature.

(27) **"Solar Absorbent Coating"** means a coating formulated for the sole purpose of absorbing solar radiation to produce heat.

(28) **"Solid Film Lubricant"** means a thin film coating ~~consisting of~~ an organic binder system containing as its chief pigment material one or more of the following: molybdenum disulfide, graphite, polytetrafluoroethylene (PTFE) or other solids that act as a dry lubricant between meeting surfaces.

(29) **"Stationary Source"** has the same meaning as defined in Rule 20.1.

(30) **"Stencil Coating"** means any ink or coating which is rolled, brushed or applied by air brush or non-refillable handheld aerosol spray containers onto a template or stamp in order to add identifying letters and/or numbers to metal parts and products.

(30)(31) **"Touch-up Operation"** means that portion of the coating operation which is incidental to the main coating process but necessary to cover minor imperfections or minor mechanical damage incurred prior to intended use, or to achieve coverage as required.

(31)(32) **"Transfer Efficiency"** means the ratio of the weight of coating solids adhering to the part being coated to the weight of coating solids used in the application process expressed as a percentage.

(32)(33) **"Volatile Organic Compounds (VOC)"** ~~for the purpose of this rule~~ means any volatile compound of carbon, which may be emitted to the atmosphere during operations or activities subject to this rule, except excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, ammonium carbonate, and exempt compounds, which may be emitted to the atmosphere during the application, drying and curing operations. VOC content of coatings is expressed in grams of VOC per liter of coating, as applied, less water and less exempt compounds. VOC content of cleaning materials is expressed in grams of VOC per liter of material.

(34) **"VOC Content Per Volume of Coating, Less Water and Exempt Compounds"** means the weight of VOC per combined volume of VOC and coating solids and is calculated by the following equation:

$$C_{c\text{voc}} = (W_s - W_w - W_{es}) / (V_m - V_w - V_{es})$$

where:

$C_{c\text{voc}}$	=	<u>VOC content less water and exempt compounds</u>
W_s	=	<u>weight of volatile compounds including water and exempt compounds</u>
W_w	=	<u>weight of water</u>
W_{es}	=	<u>weight of exempt compounds</u>
V_m	=	<u>volume of material including water and exempt compounds</u>
V_w	=	<u>volume of water</u>
V_{es}	=	<u>volume of exempt compounds</u>

(35) **"VOC Content Per Volume of Material"** means the weight of VOC per volume of material and is calculated by the following equation:

$$C_{m\text{voc}} = (W_s - W_w - W_{es}) / V_m$$

where:

$C_{m\text{voc}}$	=	<u>VOC content</u>
W_s	=	<u>weight of volatile compounds including water and exempt compounds</u>
W_w	=	<u>weight of water</u>
W_{es}	=	<u>weight of exempt compounds</u>
V_m	=	<u>volume of material including water and exempt compounds</u>

(33) **"VOC Limit"** means the ~~VOC content expressed in grams of VOC content per liter of coating, as applied, less water and less exempt VOC, or per liter of surface preparation, stripping and cleanup materials, as applied.~~

(36) **"Wet Fastener Installation Coating"** means a primer or sealant applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured.

(d) STANDARDS

(1) Transfer Efficiency: Application Equipment

Except as provided in Subsection (b)(2), no coatings shall be applied unless one of the following application methods is used: After April 16, 1991, a person shall not apply more than one gallon each day of coatings to metal parts and products subject to the provisions of this rule except by using properly operated equipment and by means of the following application methods:

- (i) Electrostatic spray application, or
- (ii) Flow coat application, or
- (iii) Dip coat application, or
- (iv) High-volume low-pressure (HVLP) spray application, or
- (v) ~~Brush coat, or~~
- (vi)(v) Roll coat, or
- (vi) Hand application methods, or
- (vii) Other coating application methods that are demonstrated to achieve at least ~~65 percent transfer efficiency, or~~ have a transfer efficiency at least equal to one of the above application methods, and which are ~~operated~~ used in such a manner that the parameters under which they were tested are permanent features of the method; Such coating application methods shall be and are approved in writing prior to use by the Air Pollution Control Officer, California Air Resources Board and Environmental Protection Agency.

~~The provisions of Subsection (d)(1) shall not apply to coatings that are applied by the use of air brushes with a coating capacity of two ounces (59.1 ml) or less through a template to add designs, letters and/or numbers to the metal parts and products.~~

(2) VOC Standards: Limits

~~Except as provided in Subsections (d)(3), a person shall not apply any coating to metal parts or products any coatings, with a VOC content in excess of the following limits expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds: including any VOC containing materials added to the original coating supplied by the manufacturer, which exceed the following VOC limits as follows:~~

Air-Dried or Forced Air Dried Coatings	340
Baked Coatings	275

(3) VOC Limits for Specialty Coatings

~~(3) A person shall not apply to metal parts and products any specialty coating of the following specialty coatings, with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds: including any VOC containing materials added to the original coating supplied by the manufacturer which exceeds the applicable VOC limits as follows:~~

SPECIALTY COATING TYPE

VOC LIMIT EFFECTIVE

October 16, 1990

	<u>AIR-DRIED</u>	<u>BAKED</u>
<u>Chemical Agent Resistant</u>	420	420
Heat Resistant	420	360
<u>Extreme-High Gloss</u>	420	360
<u>High Performance Architectural</u>	420	420
Metallic Topcoat	420	360
<u>Pretreatment Wash Primer</u>	420	420
Solar Absorbent	420	360

COATING TYPE

VOC LIMIT EFFECTIVE

	<u>October 16, 1990</u>		<u>January 1, 1994</u>	
	<u>AIR-DRIED</u>	<u>BAKED</u>	<u>AIR-DRIED</u>	<u>BAKED</u>
<u>Pretreatment Coatings (Wash Primer)</u>	780	780	420	360
<u>High Performance Architectural Coatings</u>	750	750	550	550

The requirements of Subsections (d)(2) and (d)(3) may be met using an Alternative Emission Control Plan (AECPP) that has been approved pursuant to Rule 67.1.

(4) Surface Preparation, Stripping, and Cleanup Solvents:

(i) Except as provided in Subsection (d)(5), a person shall not use VOC-containing materials for surface preparation or cleanup unless: apply solvents with a VOC content in excess of 200 grams per liter of material to metal parts and products for the purpose of stripping of coatings, surface preparation, or cleanup, excluding cleanup of application equipment; or

(i) The material contains 200 grams or less of VOC per liter of material; or

(ii) The material has an initial boiling point of 190° C (374° F) or greater; or

(iii) The material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F).

(ii) A person shall not use VOC containing material which has a composite vapor pressure greater than 45 mm Hg at a temperature of 20°C (68°F) for surface preparation, stripping or cleanup, excluding cleaning of coating application equipment. After January 1, 1992, the VOC content of such material shall not be greater than 200 grams per liter regardless of the vapor pressure of the material.

(5) Cleaning up Solvents for of Application Equipment: Effective May 1, 1991,

A person shall not use VOC containing materials for the cleaning of application equipment used in operations subject to this rule -clean application equipment unless:

(i) The cleaning material contains 200 grams or less of VOC per liter of material; or The equipment is cleaned in a solvent container which is covered when not being accessed, which has a facility for draining cleaned parts and the drained solvent is returned to a closed container; or

(ii) The cleaning material has an initial boiling point of 190° C (374° F) or greater; or The equipment is cleaned in a device which totally encloses the component parts during washing, rinsing and draining; or

(iii) The cleaning material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F); or The cleaning solvent is transferred through the application equipment, without exposure to air, into a container which has in place an apparatus or cover which completely covers the container and has no visible holes, breaks, openings or separations between adjoining components of the container or container cover; or

(iv) The cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or The solvent does not exceed a VOC limit of 200 grams per liter of solvent.

(v) The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or

(vi) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or

(vii) Other application equipment cleaning methods that are demonstrated to be as effective as any of the equipment described above in minimizing the emissions of VOC to the atmosphere, provided that the device has been tested and approved prior to use by the Air Pollution Control Officer.

~~(6) Rule 66 shall not apply to any coating operation which is subject to and in compliance with Section (d) of this rule.~~

~~(7)(6) No person shall require for use or specify the application of a coating subject to this rule if such use or application any metal part or product in San Diego County in a manner which results in a violation of this rule. This prohibition subsection shall apply to all any written or oral contracts under the terms of which any, existing or new, under which a coating is applied to any metal part or product at any location within San Diego County.~~

~~(7) Emission reduction credits that would otherwise be approvable pursuant to District Rule 26.0 et seq., shall not be granted for that portion of the emission reductions attributable to VOC contents of coatings which are subject to this rule, greater than 420 grams per liter or the applicable VOC content limit of this rule, whichever is less.~~

~~(8) A person shall not sell, offer for sale, or apply any coating or cleaning solvent subject to this rule that, after October 16, 1990, was newly reformulated to increase the content of methylene chloride, trichlorofluoromethane (CFC-11), dichlorodifluoromethane (CFC-12), trichlorotrifluoroethane (CFC-113), dichlorotetrafluoroethane (CFC-114) or chloropentafluoroethane (CFC-115).~~

~~(9) After October 16, 1990, a person shall not manufacture, sell, offer for sale, or supply any coating or cleaning material for use in metal parts and products coating operations unless the coating or cleaning material container displays the content of methylene chloride, trichlorofluoromethane (CFC 11), dichlorodifluoromethane (CFC-12), trichlorotrifluoroethane (CFC-113), dichlorotetrafluoroethane (CFC-114) or chloropentafluoroethane (CFC-115).~~

(e) **ADD-ON CONTROL EQUIPMENT DEVICE**

(1) ~~In lieu of complying with the provisions of Section Subsections (d)(2), (d)(3), (d)(4), and/or (d)(5) of this rule, a person may use an air pollution control system which: equipment which has been approved in writing by the Air Pollution Control Officer provided that the VOC emissions from such operations and/or materials are reduced such that:~~

~~(i) The air pollution control equipment has Has been installed in accordance with an Authority to Construct; and~~

~~(iii)(ii) Includes an The emission collection system which captures organic gaseous emissions, including emissions associated with applicable coating, equipment cleaning, and surface preparation operations, and transports the captured emissions to an air pollution control device; and collects at least 90 percent by weight of the emissions generated by the coating operation, including all VOC emissions from applied coatings.~~

~~(ii)(iii) Has a combined emissions capture and control device efficiency of at least 85 percent by weight. The control device reduces VOC emissions from an emissions collection system by at least 95 percent by weight, and~~

(2) ~~A person electing to use comply with provisions of Section (d) by using air pollution control equipment pursuant to subject to the requirements of this Section (e)(1) shall submit to the Air Pollution Control Officer for approval an Operation and Maintenance (O&M) plan for the proposed VOC emission control device and emission collection system and receive approval prior to operation of the control equipment. Thereafter, the plan can be modified, with Air Pollution Control Officer approval, as necessary to ensure compliance. Such plan shall:~~

~~(i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with Subsection (e)(1)(i) (iii), such as temperature, pressure, and/or flow rate; and (e)(1)(ii) of this section.~~

~~(ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding the key system operating parameters.~~

~~(3) The Operation and Maintenance plan must be submitted to the Air Pollution Control Officer and receive written approval prior to operation of the air pollution control equipment. Upon approval of the Air Pollution Control Officer, a A person subject to the requirements of this section Section (e) shall implement the plan on approval of the Air Pollution Control Officer Operation and Maintenance plan and shall comply with the provisions of the approved plan thereafter.~~

(f) **RECORDKEEPING**

All records shall be retained on-site for at least three years, and shall be made available to the District upon request.

(1) Any person subject to the provisions requirements of Sections Subsections (d)(2), (d)(3), (d)(4) and/or (d)(5) and (e) of this rule shall maintain the following records in accordance with the following:

(1)(i) Maintain a A current list of coatings, surface preparation, and cleanup VOCs materials in use which provides all of the coating, and VOC data necessary to evaluate compliance, including but not limited to:

(A) manufacturer name and identification for each coating or coating component for multi-component coatings, (this includes any components such as bases, catalysts, thinners or reducers, when supplied in separate containers), surface preparation and cleaning material; and

(B) mix ratio of components; and

(C) VOC content, vapor pressure and/or initial boiling point, as applicable, for each coating, or coating component for multi-component coatings, surface preparation and cleaning material.

(ii) Maintain current documentation to demonstrate applicability of any specialty coating category pursuant to Subsection (d)(3) of this rule.

(2)(iii) Maintain daily or monthly records of Daily records showing the type and amount of each coating and VOC used, or each coating component for multi-component coatings used. Maintain records of material additions to dip tanks used for dip coating applications.

(3)(iv) Daily Maintain daily or monthly records showing the type and amounts of solvents used for each stripping, surface preparation and cleaning up material used.

(v) Maintain records of the actual oven drying temperature, if applicable.

(4) Maintain records of the content of methylene chloride, trichlorofluoromethane (CFC-11) dichlorodifluoromethane (CFC-12), trichlorotrifluoroethane (CFC-113), dichlorotetrafluoroethane (CFC-114) and chloropentafluoroethane (CFC-115) in any coating material or cleaning material used.

(2) Any person using control equipment pursuant to Section (e) of this rule shall:

(i) Maintain records in accordance with Subsection (f)(1); and

(ii) For all coating, cleaning, and/or surface preparation materials not in compliance with Subsections (d)(2), (d)(3), (d)(4), or (d)(5) of this rule, maintain daily records of the amount of each coating or each coating component for multi-component coatings, surface preparation and cleaning material used; and

(iii) Maintain daily records of key system operating parameters as approved in the Operation and Maintenance plan. Such records shall be sufficient to document continuous compliance with Subsection (e)(1)(iii) during periods of emission producing activities.

Such records shall be retained for at least three years, and shall be made available to the District upon request.

~~For facilities subject to both Rule 67.18 and Rule 67.3, and that have received approval for an alternative recordkeeping plan to meet the requirements of Rule 67.18, the Air Pollution Control Officer may approve in writing, the use of an alternative recordkeeping plan to meet the recordkeeping requirements of Rule 67.3, provided that such plan provides for an enforceable daily record which has been approved in writing by the Air Pollution Control Officer.~~

(g) TEST METHODS

(1) Measurement of heat resistance referenced in Subsection (c)(14) of this rule shall be conducted in accordance with ASTM Standard Test Method D2485-91.

(2) Measurement of coating reflectance referenced in Subsection (c)(15) of this rule shall be conducted in accordance with ASTM Standard Test Method D523-89.

(3) Measurement of elemental metal content referenced in Subsection (c)(19) of this rule shall be conducted and reported in accordance with the South Coast Air Quality Management District's Spectrographic Method 311.

(4) Measurement of pretreatment wash primer acid content referenced in Subsection (c)(23) of this rule shall be conducted in accordance with ASTM Standard Test Method D1613-91.

(5) Perfluorocarbon (PFC) compounds shall be assumed to be absent from a coating, cleaning, or surface preparation material subject to this rule unless a manufacturer of the material or a facility operator identifies the specific individual compound(s) and the amount(s) present in the material and provides an EPA and ARB approved test method which can be used to quantify the specific compounds.

(6) Measurements of transfer efficiency subject to Subsection (d)(1)(vii) of this rule shall be conducted in accordance with the South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" as it exists on (date of adoption).

(7) Measurement of the VOCs content of coatings, surface preparation and cleaning materials subject to Subsections (d)(2), and (d)(3), (d)(4)(i) or (d)(5)(i) of this rule shall be conducted and reported in accordance with EPA Test Method 24 (40 CFR 60, Appendix A) as it exists on (date of adoption), October 16, 1990.

(8) Measurement of the VOC content of ultraviolet radiation-cured coatings subject to Subsections (d)(2) or (d)(3) of this rule shall be conducted in accordance with ASTM Standard Test Method D5403-93. Measurement of the water content and exempt solvent content, if applicable, shall be conducted and reported in accordance with ASTM Standard Test Methods D 3792-91 and D 4457-85.

(9) Measurement of the initial boiling point of cleaning and surface preparation materials subject to Subsection (d)(4)(ii) and/or (d)(5)(ii) of this rule shall be conducted in accordance with ASTM Standard Test Method D1078-86 for distillation range of volatile organic liquids.

(10) Calculation of total VOC vapor pressure for materials subject to Subsection (d)(4)(iii) and/or (d)(5)(iii) of this rule shall be conducted in accordance with the District's "Procedures for Estimating the Vapor Pressure of VOC Mixtures" as it exists on (date of adoption). If the vapor pressure of the liquid mixture, as calculated by this procedure, exceeds the limits specified in Subsection (d)(4)(iii) and/or (d)(5)(iii), the vapor pressure shall be determined in accordance with ASTM Standard Test Method D2879-83. Vapor

Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM Standard Test Methods D3792-91 and D4457-85 and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM Test Method D2879-83 shall be corrected for partial pressure of water and exempt compounds.

(11) Measurement of solvent losses from alternative application cleaning equipment subject to Subsection (d)(5)(vii) shall be conducted and reported in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" as it exists on (date of adoption).

(12) Measurement of control device efficiency subject to Subsection (e)(1) of this rule shall be conducted in accordance with EPA Methods 18 and/or 25A (40 CFR 60) as they exist on (date of adoption) and in accordance with a protocol approved by the Air Pollution Control Officer.

(13) Measurement of the emission collection system capture efficiency subject to Subsection (e)(1) of this rule shall be conducted using a protocol approved by the Air Pollution Control Officer. Subsequent to the initial compliance demonstration period, applicable key system operating parameters, as approved by the Air Pollution Control Officer, shall be used as indirect verification that capture efficiency has not diminished.

~~Measurement of the water content and exempt solvent content shall be conducted and reported in accordance with ASTM Test Methods D 4457-85 and D 3792-86.~~

~~Calculation of the VOC content of coatings less water and exempt solvents shall be performed in accordance with ASTM Standard Practice D 3960-87.~~

~~Measurement of acid content shall be conducted and reported in accordance with ASTM Test Method D 1613-81.~~

~~Measurement of elemental metal content shall be conducted and reported in accordance with the Spectrographic Method used by Pacific Spectrochemical Laboratory, Inc. for the analysis of carbon dust and carbon laminates.~~

~~Measurement of VOCs subject to Section (e) of this rule shall be conducted and reported in accordance with EPA Guidelines for Capture Efficiency Determination, and with EPA Test Methods 18 and 25 (40 CFR 60, Appendix A) as it exists on October 16, 1990.~~

~~Measurement of VOCs subject to Section (e) of this rule shall be conducted and reported in accordance with EPA Test Method 25 (40 CFR 60, Appendix A) as it exists on October 16, 1990.~~

~~Total absolute vapor pressure of VOC containing compounds pursuant to Subsection (d)(4)(ii) of this rule shall be calculated using the District's "Procedure for Estimating the Vapor Pressure of a Solvent Mixture" as it exists on October 16, 1990. If the vapor pressure of the liquid mixture exceeds the limit specified in Subsection (d)(4)(ii), the vapor pressure shall be determined in accordance with ASTM Test Method D 2879-83, Vapor Pressure Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope.~~

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS
WORKSHOP REPORT**

A workshop notice was mailed to all companies that are known to operate miscellaneous metal parts and products coating facilities in San Diego County. Notices were also mailed to all Chambers of Commerce and all Economic Development Corporations in the county, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on June 14, 1994, and was attended by 31 people. Written comments were also received. The workshop comments and District responses are as follows:

1. WORKSHOP COMMENT

The definition of coating in Subsection (c)(7) excludes adhesives, preservative oils, and materials containing less than 20 grams per liter of VOC as applied, from the definition of "coating". Are these materials subject to the rule?

DISTRICT RESPONSE

No. Rule 67.3 regulates only the application of coatings which are defined in Subsection (c)(7).

2. WORKSHOP COMMENT

If Rule 67.3 does not apply to the use of these materials, which rule(s) would be applicable?

DISTRICT RESPONSE

These materials may be subject to Rule 66 (Solvents), applicable sections of the new source review (NSR) rules, and Rule 51 (Nuisance). A separate rule for adhesives will be developed by the District in the future as required by the Regional Air Quality Strategy (RAQS).

3. WORKSHOP COMMENT

Would a coating containing less than 20 grams per liter of VOC be exempt from both Rule 67.3 and Rule 66?

DISTRICT RESPONSE

Yes. By definition, these materials are not subject to Rule 67.3. Materials that contain less than 360 grams per liter are also exempt from Rule 66, pursuant to Subsection (n)(4) of Rule 66.

4. WORKSHOP COMMENT

The proposed Subsection (a)(4) requires devices used for cleanup of coating application equipment to comply with both Rules 67.6 and 67.3. In some cases, this would require a company to purchase new equipment to replace the ones acquired only a few years ago. What is the justification for this new requirement?

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DISTRICT RESPONSE

The proposed Subsection (a)(4) applies only if the cleaning device is used for both surface preparation and application equipment cleanup. Its intent is to clarify that all devices used for cleaning and surface preparation of metal parts and products must also comply with the applicable sections of Rule 67.6, even if the same device is used for cleanup of application equipment and is in compliance with Rule 67.3.

5. WORKSHOP COMMENT

In Subsection (b)(1)(i), does the wording "per consecutive 12-month period" refer to the rolling twelve month clock period used in New Source Performance Standards promulgated by EPA?

DISTRICT RESPONSE

Yes, it does.

6. WORKSHOP COMMENT

Coatings used for touch-up and repair were previously exempt from the entire rule. The proposed revisions only exempt touch-up operations from the requirements of using high transfer efficiency application equipment, thus these small operations will now be subject to recordkeeping. What is the justification for this new requirement?

DISTRICT RESPONSE

Coatings used for touch-up and repair were previously exempt from Rule 67.3 provided that their daily usage did not exceed one quart. Daily records were required to document this exemption. Therefore the proposed changes will not trigger a new recordkeeping requirement. The facility may now keep daily or monthly usage records of all complying coatings including those used for touch-up and repair.

7. WORKSHOP COMMENT

Are coating operations which use less than twenty gallons per year still exempt from VOC limit requirements?

DISTRICT RESPONSE

Yes. Coating operations that apply 20 gallons or less of coatings per consecutive twelve month period are exempt from all Rule 67.3 requirements. Purchase and daily usage records must be maintained to document the applicability of this exemption.

8. WORKSHOP COMMENT

Are coatings used for automotive refinishing operations subject to Rule 67.3?

DISTRICT RESPONSE

No. Coatings applied to motor vehicles for refinishing are currently subject to Rule 66, and will be subject to future Rule 67.20 (Automotive Refinishing Operations), which is being developed by the District.

9. WORKSHOP COMMENT

Subsection (b)(2)(i), which exempts operations using less than one gallon per day of coatings from high transfer efficiency requirements for application equipment, is not clear. It seems that the exemption is only applicable if coatings are applied every day.

DISTRICT RESPONSE

The District agrees. The intent of this provision is to exempt operations which apply not more than one gallon of coatings per day from the high transfer efficiency coating application equipment requirements. Subsection (b)(2)(i) has been revised to clarify the District's intent.

10. WORKSHOP COMMENT

The definition of "Coating Operation" in Subsection (c)(8) should include touch-up operations.

DISTRICT RESPONSE

The definition has been revised to reflect this comment.

11. WORKSHOP COMMENT

How does the inclusion of touch-up operations in definition (c)(8), affect application stations which are currently used only for exempt "touch-up operations?"

DISTRICT RESPONSE

Subsection (c)(31) defines a touch-up operation as the portion of the coating operation which is incidental to the main coating process. A coating operation whose main function is to repair damage incurred from intended use of the coated part is not a touch-up operation as defined. An application station used specifically for repair at a stationary source would be exempt from rule requirements if the annual usage of coatings is not more than 20 gallons per year. Similarly, an application station used solely for touch-up operations, as defined, would be exempt from rule requirements if the annual usage of coatings is not more than 20 gallons per year.

12. WORKSHOP COMMENT

Does the definition of a primer in Subsection (c)(24) allow a topcoat to be applied on top of the primer?

DISTRICT RESPONSE

Yes. The first part of the definition of a primer in Subsection (c)(24) states that it is a coating applied for the purposes of providing "adhesion of subsequent coatings." A topcoat would be considered a subsequent coating.

13. WORKSHOP COMMENT

The word "also" should be added to Subsection (c)(24) in order to clarify that both types of materials can be classified as primers.

DISTRICT RESPONSE

The second part of the definition was revised as suggested.

14. WORKSHOP COMMENT

In Subsection (f)(1), daily recordkeeping requirements were replaced with monthly recordkeeping requirements. Can this be revised to allow monthly or daily recordkeeping?

DISTRICT RESPONSE

Yes. Subsection (f)(1) has been revised to include an option for keeping monthly or daily records.

15. WORKSHOP COMMENT

In Subsection (f)(1), a provision has been added to maintain records of the actual drying temperature. Does this apply to coatings that are air-dried?

DISTRICT RESPONSE

No. This provision applies to oven dried coatings only. Subsection (f)(1) has been revised accordingly.

16. WORKSHOP COMMENT

Has the language in Subsection (d)(5)(vii) been approved by EPA, and will it allow for the use of Safety Kleen type gun washers?

DISTRICT RESPONSE

Based on the emission test data submitted for application equipment washers by Safety-Kleen Corp., which was reviewed by the District, this equipment complies with the requirements of Rule 67.3. The EPA has reviewed the proposed amendments to Rule 67.3 and has not indicated any problems with the wording of this Subsection.

17. WORKSHOP COMMENT

It appears from the EPA's comments that this rule will be conditionally accepted by EPA as it is written, except for the test method problem.

DISTRICT RESPONSE

The District expects that EPA will approve the rule as written, with supporting data for the higher VOC limits for high performance architectural and pretreatment wash primer coatings.

18. WORKSHOP COMMENT

Can the coating of tactical equipment with chemically resistant camouflage paints be exempt from Rule 67.3?

DISTRICT RESPONSE

The District has proposed the addition of a specialty category for Chemical Agent Resistant Coatings (CARC) with a maximum VOC content of 420 grams per liter. Available CARC coatings are able to meet this VOC limit which does not exceed the allowable VOC limit contained in EPA's Control Technique Guideline Document (CTG) for Metal Parts and Products coatings.

19. WORKSHOP COMMENT

Are wipe cleaning operations that are performed after the coating operation subject to Rule 67.3?

DISTRICT RESPONSE

Wipe cleaning operations that are part of a metal parts and products coating operation process, including surface preparation and cleanup operations, are subject to Rule 67.3 and should comply with the standards of Subsection (d)(4).

20. ARB COMMENT

Why is the option given to maintain daily or monthly records in Subsection (f)(1)?

DISTRICT RESPONSE

Past EPA policy required daily usage records for all coating operations. EPA policy has been revised to allow monthly usage records if all of the materials being used are compliant. The District has retained the daily recordkeeping option at the request of industries that have already made considerable investments to implement a daily recordkeeping program.

21. EPA COMMENT

The District must establish Reasonably Available Control Techniques (RACT) in the rule at 420 grams per liter for the purpose of generating emission reduction credits. The District can then provide an exemption provision in the rule to allow use of the higher VOC pretreatment wash primer coatings.

DISTRICT RESPONSE

The District agrees. The VOC limit for pretreatment wash primers has been changed to 420 grams per liter for air dried and baked coatings. Specific exemptions have been provided in Subsection (b)(3)(i) for the use of pretreatment wash primers with a maximum VOC content of 780 grams per liter when used in quantities of 500 gallons or less per consecutive twelve month period at a stationary source, and in Subsection (b)(3)(ii) for the use of high performance architectural coatings with a maximum VOC content of 750 grams per liter.

22. EPA COMMENT

The recordkeeping requirements for the add-on control equipment should be more specific. The EPA suggests the following language: any person using an emission control system as a means of complying with this rule shall maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control

device during periods of emission producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of coatings requirements such as temperatures, pressures and flowrates.

DISTRICT RESPONSE

The District has reviewed the suggested EPA language and compared it to Subsections (e)(2) and (f)(2) of the proposed rule. The suggested EPA language contains four elements: applicability, daily records, content of records that will demonstrate continuous compliance, and examples of key system operating parameters. Each of these elements are included in either Subsection (e)(2) or Subsection (f)(2) of the proposed rule. The District believes that these Subsections include all of the elements in EPA's proposed language.

23. EPA COMMENT

The South Coast Air Quality Management District's Spectrographic Method 311 is referenced in the rule. This method has not been approved by EPA's Emission Measurement Branch (EMB).

DISTRICT RESPONSE

As of this date, the Emission Measurement Branch of the EPA has not approved any test method for determining the elemental metal content of a coating. Therefore EPA, Region IX has indicated that South Coast Air Quality Management District's Spectrographic Method 311 will be acceptable until a test method is approved, and will not cause disapproval of the rule.

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