

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

**PROPOSED AMENDMENTS TO RULE 67.4 –
METAL CONTAINER, METAL CLOSURE AND METAL COIL
COATING OPERATIONS**

WORKSHOP REPORT

A workshop notice was mailed to the companies and government agencies in San Diego County that may be subject to proposed amended Rule 67.4 – Metal Container, Metal Closure and Metal Coil Coating Operations. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on January 13, 2011, and was attended by two persons. Written comments were also received before and after the workshop. The workshop comments and District responses are as follows:

1. WORKSHOP COMMENT

Is it possible to use purchase records of cleaning materials instead of usage records to satisfy the rule record keeping requirements?

DISTRICT RESPONSE

The purchase records of VOC-containing cleaning materials may be very helpful in determining the total amount of VOC emissions from a facility. However, purchase records alone are not sufficient and could lead to an overestimate of emissions. Usage records are therefore required. For example, a facility may have a permit condition restricting the amount of daily emissions pursuant to New Source Review rules, such as 10 pounds of VOC emissions per day. In order to calculate daily emissions in this case, the actual usage of VOC-containing materials is required.

For facilities that do not have permit conditions limiting the daily amount of VOC emissions, monthly usage record keeping should be sufficient and is permitted under Rule 67.4. The monthly usage of coatings or cleaning solvents can be determined, for example, by using dispensing records, measuring the level of a material with a measuring stick, or weighing a container with such material in the beginning and the end of each month.

2. WORKSHOP COMMENT

Is it allowable to keep monthly records of VOC containing materials instead of daily records?

DISTRICT RESPONSE

Yes, monthly (or daily) record keeping is allowed pursuant to Subsection (f)(1)(ii) of the rule, unless the facility uses emission control equipment and is therefore subject to the daily record keeping requirements of Subsection (f)(2). Furthermore, as stated in the response to Comment 1, in some cases daily records may be required as a permit condition, such as for compliance with any applicable New Source Review rules.

3. EPA COMMENT

It is recommended that Rule 67.4 include the actual approval date of EPA test methods. If a test method cited in the rule is developed by other agencies, such as other California air districts, Section (g) should specify the date this test method was approved by EPA.

DISTRICT RESPONSE

The District agrees. The proposed rule has been revised as suggested.

4. EPA COMMENT

Subsection (g)(7) for the determination of capture efficiency of an emission collection system should be revised by adding the reference to 40 CFR 51, Appendix M, and Test Methods 204A through 204F.

DISTRICT RESPONSE

Subsection (g)(7) has been revised as suggested.

5. EPA COMMENT

Subsection (e)(1)(iii) specifies that overall control efficiency of add-on air pollution control system must be at least 85%. Some other air districts in California require the overall control efficiency to be at least 90%. Rule 67.4 requirements should be as stringent as similar rules in other districts.

DISTRICT RESPONSE

The District disagrees. It should be noted that there are only two companies in San Diego County subject to Rule 67.4, with a combined total VOC emissions of less than four tons per year. Therefore, an incremental emission reduction benefit of a control system with 90% overall control efficiency versus 85% efficiency will be negligible. In addition, to achieve a 90% overall

control efficiency of an air pollution control system, both the collection and emission reduction systems must be at least 95% efficient. Such requirements are very stringent and do not allow for any minor deviations from the perfect functioning of both systems, and this requirement seems to be excessive in this case.

6. EPA COMMENT

SCAQMD Rule 1125 requires coating application methods other than those specified in the rule to be at least as efficient as High Volume Low Pressure (HVLV) system. Subsection (d)(2)(vii) should be revised to stipulate this.

DISTRICT RESPONSE

The District disagrees. Subsection (d)(2)(vii) already stipulates that other coating application methods may be used provided that their transfer efficiency is at least equal to one of the approved methods, which includes HVLV.

7. EPA COMMENT

For clarity, all coating application methods listed in Subsection (d)(2) should be defined in Section (c).

DISTRICT RESPONSE

The definitions of various allowable coating application methods appear in a number of other District coating rules. These definitions are identical from rule to rule. In order to keep source-specific rules as concise as possible, the District plans to include these definitions in the next revision of Rule 2 (Definitions), which contains the definition of terms used throughout the District rules and regulations.

NY:RR:jlm
02/02/11