APCD
AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

Air Pollution Control Board

Greg Cox	District 1
Dianne Jacob	District 2
Dave Roberts	District 3
Ron Roberts	District 4
Bill Horn	District 5

May 5, 2015

NOTICE OF WORKSHOP

FOR DISCUSSION OF REVISED DRAFT AMENDMENTS TO RULE 11 – EXEMPTIONS FROM RULE 10 PERMIT REQUIREMENTS

The San Diego County Air Pollution Control District (District) will hold a public meeting to present and discuss revised draft amendments to Rule 11 – Exemptions from Rule 10 Permit Requirements. A workshop on the initial draft amendments was held on June 9, 2014; numerous comments were received. In response to these comments, the District prepared a workshop report and post-workshop draft of proposed amendments to Rule 11, which were released on March 18, 2015. Since then, a few additional revisions were made to the draft amendments in response to additional information received. The District will hold a public meeting to present and discuss the revised draft version of proposed amendments to Rule 11. Comments may be submitted in writing before or made at the workshop, which is scheduled as follows:

DATE:	**Friday, June 19, 2015**
TIME:	**9:30 a.m. – 12:00 p.m.**
PLACE:	**San Diego County Operations Center** **5500 Overland Avenue, 1st Floor, Room 120** **San Diego, CA 92123**

Rule 11 provides exemptions for equipment, operations, and processes which otherwise would require a Permit to Operate in accordance with District Rule 10. The proposed amendments will add new exemptions from permit requirements for equipment and processes that do not constitute significant sources of air pollution. Additionally, several existing exemptions are proposed for revision to update the specified criteria for exemption. Clarifications were also made to several definitions and exemptions.

Please note that there will be a separate workshop, held immediately after this workshop, to discuss proposed amendments to Rule 66.1 – Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds. These proposed amendments are necessary in order to make Rule 66.1 consistent with the proposed changes for surface preparation and solvent cleaning operations made to Rule 11 as discussed below.

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Specifically, the proposed amended Rule 11 would accomplish the following:

Add New Exemptions From Permit Requirements For:

- (d)(7)(iv): Brazing and welding equipment, including arc welding equipment and laser welding.
- (d)(10)(v): Tub grinders and trommel screens used for processing green material, as defined.
- (d)(10)(viii): Equipment used for buffing, polishing, carving, cutting, deburring, drilling, machining, routing, shearing, sanding, sawing, or surface grinding of fiberglass or calcium silicate parts with some restrictions.
- (d)(15)(ix): Coating operations located at schools and used exclusively for student theatrical productions or art instruction.
- (d)(16)(ix)(A) through (D): Surface preparation and solvent wipe cleaning operations for quality control or quality assurance, using non-refillable handheld aerosol spray containers, routine janitorial maintenance, or performed in conjunction with welding of 5XXX series aluminum.
- (d)(16)(ix)(E): Surface preparation and solvent wipe cleaning operations not associated with a permitted operation provided that: the cleaning material has a volatile organic compound (VOC) content of 25 grams per liter or less, or the uncontrolled VOC emissions at the stationary sources do not exceed 3,650 pounds per year or 550 gallons per year.
- (d)(18)(i): Non-immersion dry cleaning equipment that uses water or exempt compounds as the cleaning solvent, provided that the VOC content of detergents and additives used does not exceed 50 grams per liter.
- (d)(19)(xix): Low-emitting unit with an emission rate of 2 pounds per day or less of each criteria pollutant.
- (d)(19)(xxii): Industrial wastewater treatment meeting specified conditions.
- (d)(19)(xxxi): Soil, sediment, air or groundwater monitoring performed to meet the requirements of other regulatory agencies.
- (d)(19)(xxxii): Any underground building ventilation system, sub-slab depressurization system, or soil/vapor intrusion mitigation associated with soil, vapor or groundwater that is not required to be remediated by any other regulatory agency.
- (d)(19)(xxxiii): Additive manufacturing (3-D printing) equipment.

Deletions For:

- Proposed change to (d)(1)(ii): The exemption for auxiliary sweeper engines will remain at 200 brake horsepower or less.

- Proposed changes to (d)(4): Some proposed changes were deleted from (d)(4), Laboratory Equipment and Related Operations.

- Proposed (d)(15) Preamble: Deleted proposed definition of "Operation" that applied to Subsection (d)(15).

- Existing (d)(19)(xix): Deleted Certificate of Exemption (COE) process. The proposed exemption for a low-emitting unit with an emission rate of 2 pounds per day or less of each criteria pollutant will take its place.

Revise or Clarify the Following:

Applicability:

- (a)(3): Rule 11 will not apply to any equipment, operation, or process that violates Rule 50 (Visible Emissions) or Rule 51 (Nuisance) as determined by the Air Pollution Control Officer.

Exemptions:

- (d)(7)(iii): The exemption was amended to clarify that solder leveler, hydrosqueegee, wave solder and drag solder machines are exempt if they emit less than an average of 5 pounds of VOC per operating day.

- (d)(7)(viii): Exemption was clarified to state that thermal spraying operations are exempt provided the maximum amount of material sprayed is less than 20 pounds per day at the stationary source.

- (d)(12)(iii): The exemption for coffee roasting equipment was updated from a manufacturers' rating of 15 pounds per hour or less to a maximum capacity of 11 pounds (5 kg) or less.

- (d)(12)(iv): Bakery oven exemption was amended to clarify that ovens used exclusively to bake non-yeast-leavened products do not count towards the 2 million BTU per hour exemption limit.

- (d)(12)(vii): The exemption limit for equipment used to brew beer at breweries was raised from one million gallons to 100,000 barrels (3.1 million gallons).

- (d)(18)(iv): Laundry dryers, extractors, or tumblers used for fabrics cleaned only with solutions of bleach or detergents, provided that the VOC content of detergents and additives used does not exceed 50 grams per liter. This exemption does not apply to equipment used for previously VOC-laden materials such as rags, cloths, etc.

- (d)(19)(xxvi): The exemption for agricultural sources was amended to increase the exemption threshold for certain criteria pollutants.

- (d)(19)(xxix): Ozone generators capacity exemption threshold was increased to less than 1,000 grams of ozone per hour.

The proposed amended rule also contains additional definitions and provides other minor clarifications and updates.

Copies of the revised draft amendments to Rule 11 and a map of the workshop location are available at http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf. Please note that the initial draft amendments to Rule 11 (as presented in the first workshop) are shown by single underline/strikethrough; changes made based on comments received at the first workshop (and as reflected in the post-workshop draft that was previously released) are shown by double underline/strikethrough; changes to the post-workshop draft are shown by double-underline/strikethrough and are italicized. A clean draft of the proposed amended rule is also available for downloading.

The District requests that workshop participants bring their own copies of the proposed amended rule. If you have any questions concerning the rule, please contact Angela Ortega at (858) 586-2753.

Robert C Reider

ROBERT C. REIDER, Deputy Director
Air Pollution Control District

RR:AO:jlm

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May 5, 2015

NOTICE OF WORKSHOP

FOR DISCUSSION OF PROPOSED AMENDMENTS TO RULE 66.1 – MISCELLANEOUS SURFACE COATING OPERATIONS AND OTHER PROCESSES EMITTING VOLATILE ORGANIC COMPOUNDS

The San Diego County Air Pollution Control District (District) will hold a public meeting to present and discuss proposed amendments to Rule 66.1 – Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds. Comments and questions concerning the proposal may be submitted in writing before or made at the meeting, which is scheduled as follows:

DATE: **Friday, June 19, 2015**

TIME: **1:00 p.m. to 3:00 p.m.**

PLACE: **San Diego County Operations Center**
5500 Overland Avenue, 1st Floor, Room 120
San Diego, CA 92123

Rule 66.1, adopted in February 2010, is a "catch all" regulation that applies to sources and operations that are not covered by source-specific rules controlling volatile organic compound (VOC) emissions. Recent proposed amendments to District Rule 11 – Exemptions from Rule 10 Permit Requirements, will affect surface preparation and solvent cleaning operations subject to Rule 66.1. The proposed amendments to Rule 66.1 will ensure consistency between both rules. Please note that there will be a separate workshop, held immediately before this workshop, to discuss proposed amendments to Rule 11.

Specifically, proposed amended Rule 66.1 will:

- Delete the exemption for any solvent cleaning, including wipe cleaning, or surface preparation of electrical or electronic components, medical devices, laser optics or precision optics components. These operations will now have a VOC limit specified in Subsection (d)(2).

- Exempt from all rule requirements surface preparation or solvent cleaning, including wipe cleaning, for quality control or quality assurance purposes.

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- Exempt from all rule requirements surface preparation or solvent cleaning, including wipe cleaning, for routine janitorial maintenance and graffiti removal.

- Delete the exemption for the cleaning and surface preparation of aerospace components. These operations will now have a specific vapor pressure limit or VOC limit specified in Subsection (d)(2).

- Increase the usage exemption for surface preparation or solvent cleaning from 20 gallons to 550 gallons per year, consistent with the proposed Rule 11 amendments.

- Increase the VOC emission exemption for surface preparation or solvent cleaning from 150 pounds per year to 3,650 pounds per year, consistent with the proposed Rule 11 amendments.

- Add new definitions and amend existing definitions.

- Add categories for various surface preparation or solvent cleaning operations with corresponding VOC limits consistent with the VOC limits found in other districts for similar operations.

- Update the test methods for determining compliance.

- Provide a compliance schedule for new and existing operations that are or may be subject to this rule.

Copies of proposed Rule 66.1 and a map of the workshop location are available on the District's website at http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf. The District requests that workshop participants bring their own copies of the draft proposed rule. If you have any questions concerning the rule, please contact Angela Ortega at (858) 586-2753.

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