



Air Pollution Control Board	
Greg Cox	District 1
Dianne Jacob	District 2
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Bill Horn	District 5

April 22, 2014

NOTICE OF WORKSHOP

FOR DISCUSSION OF PROPOSED 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 proposed amendments to Rule 11 – Exemptions from Rule 10 Permit Requirements. Comments concerning this proposal may be submitted in writing before, or made at, the workshop, which is scheduled as follows:

DATE: Monday, June 9, 2014
TIME: 9:30 a.m. – 12:00 p.m.
PLACE: San Diego County Operations Center
5500 Overland Avenue, Room 120
San Diego, CA 92123

Location Map (http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf)

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 several new exemptions from permit requirements for equipment and processes that do not constitute significant sources of air pollution. Additionally, two existing exemptions are proposed for deletion, and several existing exemptions are proposed for revision to update the specified criteria for exemption. Clarifications were also made to several definitions and exemptions.

Specifically, the proposed amended rule would accomplish the following.

Add New Exemptions From Permit Requirements For:

- (d)(2)(xiv): Gas turbines used for educational purposes, provided the turbine is operated less than 20 hours/year.
- (d)(6)(vii): Water cooling towers and cooling ponds used for evaporative cooling of reclaimed water.
- (d)(10)(vii): Equipment used for buffing, polishing, carving, cutting, deburring, machining, routing, shearing, sanding, sawing, or surface grinding of fiberglass parts with some

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restrictions. The limit of 500 pounds/year of collected fiberglass and recordkeeping requirements were removed.

- (d)(15)(viii): Coating operations used exclusively for instruction and located in schools of higher learning (e.g., colleges and universities).
- (d)(16)(vi): Metal inspection spraying operations where no materials applied contain volatile organic compounds (VOCs).
- (d)(16)(ix): Surface preparation and solvent wipe cleaning operations, provided (a) VOC content of cleaning material is 50 grams/liter or less and total solvent usage does not exceed 3,000 gallons/year, or b) total VOC vapor pressure of cleaning material is 8 mmHg or less and VOC emissions from such operations do not exceed 1,300 pounds/year.
- (d)(16)(x): Surface preparation and solvent wipe cleaning of electrical or electronic components, medical devices, laser optics, or precision optics components, and operations exempt from Rule 66.1(d)(2), provided these operations are not associated with any permitted operation and VOC emissions from such operations do not exceed 2,500 pounds/year.
- (d)(16)(xi): Asbestos mastic removal operations using organic solvents, provided the total VOC vapor pressure of solvent is 0.2 mmHg or less.
- (d)(18)(vii): Professional laundering equipment using liquid carbon dioxide and meeting specified conditions.
- (d)(19)(xxviii): Ozone generators meeting specified conditions.
- (d)(19)(xxix): Site assessments for soil and/or groundwater remediation operations meeting specified conditions.
- (d)(19)(xxx): Asbestos removal equipment and operations subject to, or exempt from, the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP).

Delete Exemptions For:

- Existing (d)(2)(vii): Portable pile drivers and construction cranes. The engines on this equipment are subject to State Air Toxic Control Measures (ATCM).
- Existing (d)(10)(v): Tub grinders and trommel screens used for processing wood waste.

Revise or Clarify the Following:

- Applicability (a)(2): Rule 11 will now apply to equipment, operations, or processes that are subject to the provisions of NESHAP or New Source Performance Standards (NSPS).
- Definition (c)(5): Engine continuous brake horsepower rating will be determined by either the engine nameplate or by supporting documentation for de-rated engines.

Exemptions:

- (d)(1)(ii): The brake horsepower output rating limit of auxiliary sweeper engines was reduced from less than 200 brake horsepower (bhp) to less than 50 bhp, to be consistent with State ATCM.
- (d)(4)(i): Wipe cleaning, associated with laboratory or R&D operations, is considered part of such operations and is exempt from permit requirements.
- (d)(4)(vi): Equipment used to manufacture diagnostic kits or products for FDA trials. The VOC emission limit that qualifies for exemption was reduced from 5 tons/year to 2,000 pounds/year.
- (d)(7)(iii): Solder leveler, hydrosqueegee, wave solder and drag solder machines are exempt if they emit less than an average of 10 pounds of VOC per operating day for each calendar month.
- (d)(7)(viii): Thermal spraying operations where materials sprayed do not contain cadmium, copper or manganese, provided the spray gun capacity is less than 20 pounds/day.
- (d)(9)(iv): Abrasive blasting pots with sand capacity rating of less than 100 pounds are exempt. However, this exemption does not apply to pots used in an abrasive blasting room or booth.
- (d)(15): The term "Operation" is defined as the coating of an individual substrate (e.g., wood or plastic or metal, etc.) or the application of an adhesive material.
- (d)(15)(ii): The application of rubberized asphalt is not included in the exemption for application equipment and processes used to apply coatings or adhesive materials to stationary structures and/or their appurtenances, to pavement, or to curbs.
- (d)(15)(iv): The uncontrolled VOC emission limit of 150 pounds/year or less also applies to portable coating or portable adhesive materials application operations.
- (d)(16)(i): Water-based cleaning solvent is any solvent that consists of only water and VOC and does not contain exempt compounds.

- Existing (d)(16)(viii): Solvent wipe cleaning operations, emitting less than 5 tons/year or using less than 1,500 gallons/year. (Replaced with 2 new exemptions: (d)(16)(ix) and (d)(16)(x), above.)
- (d)(18): Any operation using perchloroethylene (perc) as a dry cleaning solvent is not exempt from permit requirements.
- (d)(18)(i): Non-immersion dry cleaning operations. Replaced with exemption for dry cleaning touch up operations using hand held spray applicators.
- (d)(18)(v): Equipment used for wet cleaning using water as a cleaning agent. Revised to include exempt compounds as cleaning solvents meeting specified conditions.
- (d)(19)(iv): Paper shredders and disintegrators with a maximum throughput capacity not to exceed 600 pounds/hour must be either rated by manufacturer or stated by manufacturer for the current configuration.
- (d)(19)(xi): Biotechnology manufacturing operations emitting less than an average of 15 pound/day are exempt from permit requirements.
- (d)(19)(xxi) and (xxii): The exemptions for wastewater treatment facilities apply only to municipal wastewater treatment facilities.
- (d)(19)(xxvii): Operations that exclusively use preservative oils and compounds, lubricants, etc. containing no VOCs are not considered coating operations and are still exempt from permit requirements. A definition for "Preservative Oils and Compounds" was also added for clarification.

The proposed amended rule also contains additional definitions and test methods, and provides other minor clarifications and updates. Additionally, the time-frame to maintain on-site records was revised where necessary from two years to three years, to ensure consistency throughout the rule.

If you would like a copy of proposed amended Rule 11, please access the District's website at http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf or call Janet McCue at (858) 586-2712. If you have any questions concerning the rule, please call Angela Durr at (858) 586-2753 or Natalie Yates at (858) 586-2756.



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Air Pollution Control District

AD:RR:jlm