

INCREMENTAL COST-EFFECTIVENESS ANALYSIS

**PROPOSED AMENDED RULE 67.6.1 – COLD SOLVENT CLEANING
AND STRIPPING OPERATIONS
AND RULE 67.6.2 VAPOR DEGREASING OPERATIONS**

Health and Safety Code Section 40920.6(a) requires air districts to identify one or more potential control options that achieve at least the same benefit as the proposed rule, assess the cost-effectiveness of those options, and calculate the incremental cost-effectiveness of each identified option. Incremental cost-effectiveness is defined as the difference in control costs divided by the difference in emission reductions between two potential control options achieving the same emission reduction goal.

The primary objectives in the proposed amendments to Rule 67.6.1 and Rule 67.6.2 are: 1) to align the volatile organic compound (VOC) content limits with the existing limit specified in Rule 11 – Exemptions from Rule 10 Permitting Requirements, and 2) satisfy federal requirements to implement current Reasonably Available Control Technology (RACT). The proposed amendments lower the solvent volatile organic compound (VOC) content limit to be consistent with analogous rules of other California air districts.

There are no potential control options providing equivalent emission reductions from vapor and cold solvent cleaning and stripping operations other than the mandatory use of add-on emission control systems with potential capital costs upwards of \$200,000. Due to high costs, this control option would have very unfavorable cost-effectiveness and incremental cost-effectiveness values and is therefore not feasible.

Most affected facilities voluntarily comply with the lower VOC content limits in the proposed amended rules and are consequently exempt from permitting requirements. Therefore, no additional costs will be incurred by those facilities. For the remaining facilities that maintain current Permits to Operate, their cleaning operations are exempt from the VOC content requirements of current Rule 67.6.1 due to the types of components being cleaned, and the proposed amendments will have no impact on their operations.