

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

**DRAFT PROPOSED AMENDMENTS TO  
RULE 67.6.1 – COLD SOLVENT CLEANING AND STRIPPING OPERATIONS,  
AND TO  
RULE 67.6.2 – VAPOR DEGREASING OPERATIONS**

**WORKSHOP REPORT**

On November 28, 2018, the San Diego County Air Pollution Control District (District) conducted a public workshop to present and receive comments on draft proposed amendments to Rule 11 – Exemptions from Rule 10 Permit Requirements, and related amendments to Rule 67.6.1 – Cold Solvent Cleaning and Stripping Operations, and Rule 67.6.2 – Vapor Degreasing Operations. The original amendments consisted of exempting degreasers with low or no volatile organic compound (VOC) emissions from permit and rule requirements.

The U.S. Environmental Protection Agency (EPA) provided numerous comments on the draft proposed amendments to Rules 67.6.1 and 67.6.2. Due to the nature of these comments and the December 2018 shutdown of the EPA, the effort to update Rules 67.6.1 and 67.6.2 was temporarily suspended. Nevertheless, the proposed amendments to Rule 11 moved forward and were adopted by the Air Pollution Control Board on October 30, 2019.

The District has since held discussions with EPA staff to better understand their comments and now proposes to move forward with the proposed amendments to Rules 67.6.1 and 67.6.2 to make the rules consistent with related provisions in Rule 11, and to address minor deficiencies identified by the EPA that require correction to assure federal approval of the rules.

A summary of the EPA comments and the District responses to these comments are as follows:

**EPA COMMENTS FOR RULE 67.6.1**

**1. EPA COMMENT**

The District should remove the reference to 40 CFR Part 63, Subpart T, National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning in existing Subsection (b)(1)(ii).

**DISTRICT RESPONSE**

The District agrees. The exemption in existing Subsection (b)(1)(ii) referencing Subpart T, National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning has been removed as suggested.

**2. EPA COMMENT**

The District should revise Subsection (a)(2) to expand the applicability of the rule to the cleaning of application equipment.

**DISTRICT RESPONSE**

The District disagrees. The cleaning of application equipment is already regulated under each District source-specific rule or Rule 66.1 – Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds.

**3. EPA COMMENT**

The District should amend Subsection (a)(5), to clarify that operations subject to or exempt from Rule 67.6.1 are not subject to Rule 66.1 – Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds.

**DISTRICT RESPONSE**

The District agrees. Subsection (a)(5) has been revised as suggested.

**4. EPA COMMENT**

The District should clarify what is meant by “educational purposes” or “educational institution” in existing Subsection (b)(1)(v).

**DISTRICT RESPONSE**

At this time, the District is pursuing only those changes related to approvability issues or to incorporate minor language clarifications recommended by EPA. The District will perform a more thorough review and consideration of this recommendation during future amendments of Rule 67.6.1.

**5. EPA COMMENT**

The District should revise existing Subsection (b)(1)(vi) to only exempt materials with a VOC content of less than 25 grams per liter (g/l) (0.21 lbs/gal) as used. The current language seems to be in conflict with the language in Subsection (d)(1).

**DISTRICT RESPONSE**

The District disagrees. The proposed rule would exempt the use of solvent cleaning materials with a VOC content of 25 g/l or less. Subsection (d)(1) prohibits (unless otherwise noted) the use of solvent cleaning materials with a VOC content exceeding 25 g/l. There is no conflicting language and these provisions are consistent with the analogous rules of other California air districts.

**6. EPA COMMENT**

The District should add a definition for “VOC content per volume of material.”

**DISTRICT RESPONSE**

The District agrees. The definition for “VOC Content Per Volume of Material” was added to Section (c) Definitions as suggested.

**7. EPA COMMENT**

The District should revise Subsection (d)(3)(i)(A) to have a freeboard ratio greater than or equal to 0.7 as per the 1977 Control Techniques Guidelines (CTG) on Solvent Metal Cleaning recommendation of a freeboard ratio for cold cleaners of  $\geq 0.7$  (for highly volatile solvents  $>33$  mm or 0.6 psi at 100F or if the solvent is heated about 120F 1977 CTG Table 1 pg v).

**DISTRICT RESPONSE**

At this time, the District is focused on only making changes related to approvability issues or to minor language clarifications recommended by EPA. The District will perform a more thorough review and consideration of this recommendation during future rule amendments to Rule 67.6.1.

**8. EPA COMMENT**

The District should modify Subsections (d)(4)(xii), and (d)(6)(x), to incorporate the latest changes to the California Health & Safety Code for waste solvent and contaminated residue disposal/recycling.

**DISTRICT RESPONSE**

The District agrees. Subsections (d)(4)(xii) and (d)(6)(x) have been revised to reflect the most current California Health & Safety Code reference as suggested.

**9. EPA COMMENT**

The District should revise Subsection (e)(1)(ii) to include instructions on what to do with contaminated cloths, rags, etc., used to clean up a spill.

**DISTRICT RESPONSE**

The District disagrees. All operations, including the use of cloths and rags used to clean up a spill, are subject to District Rule 67.17 – Storage of Materials Containing Volatile Organic Compounds. Rule 67.17 is referenced in the Permit to Operate for each individual degreaser.

**EPA COMMENTS FOR RULE 67.6.2**

**1. EPA COMMENT**

The District should revise existing Subsection (b)(1)(i) to only exempt materials with a VOC content of less than 25 grams per liter (g/l) (0.21 lbs/gal) as used.

**DISTRICT RESPONSE**

The District disagrees. The language is consistent with language in Rule 67.6.1 – Cold Solvent Cleaning and Stripping Operations and Rule 11 – Exemptions from Rule 10 Permit Requirements.

**2. EPA COMMENT**

The District should add a definition for “VOC content per volume of material.”

**DISTRICT RESPONSE**

The District agrees. The definition for “VOC Content Per Volume of Material” was added to Section (c) Definitions as suggested.

**3. EPA COMMENT**

The District should modify the Standards Subsection (d)(4)(xiii) to incorporate the latest changes to the California Health & Safety Code for waste solvent and contaminated residue disposal/recycling.

**DISTRICT RESPONSE**

The District agrees. Subsection (d)(4)(xiii) has been revised to reflect the most current California Health & Safety Code reference as suggested.

4. **EPA COMMENT**

The District should revise Subsection (e)(1)(ii) to include instructions on what to do with contaminated cloths, rags, etc., used to clean up a spill.

**DISTRICT RESPONSE**

The District disagrees. All operations, including the use of cloths and rags used to clean up a spill, are subject to District Rule 67.17 – Storage of Materials Containing Volatile Organic Compounds. Rule 67.17 is referenced in the Permit to Operate for each individual degreaser.

JH:AMF;jlm  
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