AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

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Air Pollution Control Officer
R. J. Sommerville

COMPLIANCE ADVISORY

Notice of Amendments to Rule 67.3
Metal Parts and Products Coating Operations

On November 1, 1994, the Air Pollution Control District adopted amendments to Rule 67.3, an existing rule that regulates emissions of volatile organic compounds (VOC's) from metal parts and products coating operations. The primary purpose of the amendments was to correct deficiencies identified by the Environmental Protection Agency (EPA). The new amendments also provide more choices of materials and devices for surface preparation, cleaning and for cleaning of coating application equipment. Facilities using compliant coatings will also have the option of keeping monthly instead of daily records. In addition, the amended rule provides a limited exemption for facilities using Pretreatment Wash Primers.

The amended rule includes the following:

Applicability — Clarifies the type of operations which are exempt from or subject to metal parts and products coating operations.

Exemptions — Adds an exemption for powder coating operations using less than 0.5 gallons per day of cleaning or surface preparation solvent. Modifies the exemption for touch-up operations. Adds an exemption from general VOC limits for Pretreatment Wash Primers, provided that not more than 500 gallons per year is used at a facility. Provides an exemption for an existing facility using High Performance Architectural Coatings.

Definitions — Adds, deletes or amends certain definitions for clarification.

Application Equipment — Clarifies the requirements for coating application equipment.

VOC Limits — Adds a new specialty category for Chemical Agent Resistant Coating with a VOC limit of 420 grams per liter and revises the VOC limit for High Performance Architectural Coatings.

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Surface Preparation and Clean-up	Adds an option for using solvents with high boiling point or low vapor pressure for surface preparation and cleanup operations. Adds additional optional methods for coating application equipment cleanup operations.
Control Equipment	Clarifies the requirements for using add-on control equipment in lieu of complying with the rule's VOC limits.
Recordkeeping Requirements	Clarifies recordkeeping requirements and provides an option for keeping monthly or daily usage records of VOC-containing materials.
Test Methods	Updates test methods for determining compliance with the rule.

A copy of Rule 67.3 is enclosed. For more information, please call the District's Compliance Division at (619) 694-3340.