




## MEMORANDUM

**TO:** Community Advisory Council Members  
**FROM:** Doug Grapple   
**DATE:** March 27, 2012  
**SUBJECT:** Proposed Amendments to Rules 102, 202, 330, 337, 349, 353, and 321

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Enclosed please find a Background Paper on amendments to the following rules:

- Rule 102, Definitions
- Rule 202, Exemptions to Rule 201
- Rule 330, Surface Coating of Metal Parts and Products
- Rule 337, Surface Coating of Aerospace Vehicles and Components
- Rule 349, Polyester Resin Operations
- Rule 353, Adhesives and Sealants
- Rule 321, Solvent Cleaning Machines and Solvent Cleaning

The proposed amended rules (PARs) are within Appendices A - G of the Background Paper. We plan to ask the APCD Board of Directors to consider adopting the amended rules on June 21, 2012.

Staff brought an earlier version of this rulemaking project to the Community Advisory Council (CAC) on August 10, 2011. Due to several concerns raised, the CAC continued the item. In the interim, we have made changes to address the CAC concerns and conducted another series of meetings with stakeholder groups. Based on feedback received to date, we believe the current proposed amendments adequately address stakeholder concerns.

### Project Summary

PARs 330, 337, 349, and 353 include new or amended solvent cleaning provisions consistent with the 2010 Clean Air Plan adopted control measures. These provisions reflect the requirements added to Rule 321, Solvent Cleaning Machines and Solvent Cleaning, in September 2010, and similar provisions in other California air district rules. These control techniques include use of low emission materials, methods, and work practices.

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Amended Rules 330, 349, and 353 will limit the cleaning solvent reactive organic compound (ROC) content to 25 grams per liter. Rule 337 coating categories and limits are being changed to reflect those found in a U.S. Environmental Protection Agency (USEPA) Control Techniques Guideline document or other California air district rules. And the PAR 337 solvent requirement is to use a solvent that does not exceed: 1) an ROC content of 200 grams of per liter, or 2) a composite partial pressure of 45 mm Hg at 20 °C. (Isopropyl alcohol has a composite partial pressure of 33 mm Hg @ 20 °C; which complies with the latter PAR 337 solvent provision.)

Amendments to Rule 102 (Definitions) and Rule 202 (Exemptions to Rule 201) are proposed for uniformity, updating, and improved rule clarity. Also, a slight change to a Rule 321 exemption is now included in this rule package. This was needed to clarify that the *solvent cleaning machine* requirements of Rule 321 apply when facilities subject to an operation-specific rule (e.g., 330, 337, 349, or 353) are using a degreaser.

Staff intend to explain any additional changes that have been made at the April 11 CAC meeting.

Attachments:

- 1) Summary of Significant Changes Made to the July 25, 2011 draft Rules
- 2) Updated Background Paper (includes revised rules in Appendices A - G; yellow highlighting in the PARs indicates changes from the July 25, 2011 drafts and newly added balloon comments are in red font)