

## SUMMARY OF SIGNIFICANT CHANGES MADE TO THE JULY 25, 2011 DRAFT RULES

### I. SUMMARY OF SIGNIFICANT CHANGES COMMON TO MORE THAN ONE RULE

|    | Description of Change   | PAR 330<br>Section                               | PAR 337<br>Section                                | PAR 349<br>Section                                 | PAR 353<br>Section                              |
|----|---|--|---|--|---|
| 1  | Changed the <i>exemption</i> text per CAC feedback.   | B  | B   | B  | B   |
| 2  | The <i>aerosol product</i> exemption is retained.   | B.5  | B.3   | -  | -   |
| 3  | Added items like <i>encasements for electronic components</i> and <i>solar cells</i> to the solvent cleaning exemption.   | B.11   | B.9   | B.4  | B.13  |
| 4  | Added an exemption for cleaning personal protective equipment.  | B.11.g   | B.14  | B.4.f and<br>B.7                                   | B.13.j  |
| 5  | Revised Section C, Definitions (moved terms to Rule 102, Definitions, and deleted others). <sup>1</sup>   | C  | C   | C  | C   |
| 6  | An alternative to the overall efficiency has been added, which shows:<br><br>Alternatively, the control device reactive organic compound exhaust concentration shall not exceed 10 parts per million by volume as propane or other limit approved by the Environmental Protection Agency, the Air Resources Board, and the Control Officer.<br><br>For verifying compliance, provisions on testing exhaust ROC concentrations have also been added. | D.4.a<br><br><br><br><br><br><br><br><br><br>I.7 | D.3.a<br><br><br><br><br><br><br><br><br><br>I.10 | D.1.f.i<br><br><br><br><br><br><br><br><br><br>E.8 | I.1<br><br><br><br><br><br><br><br><br><br>N.14 |
| 7  | The referenced sections were modified to read, "Control device efficiency shall be continuously monitored when operating a carbon adsorber or control device other than a thermal or catalytic incinerator."  | D.4.d  | D.4.d   | D.1.f.iv   | I.4   |
| 8  | The "20% ROC solvent residue or less" provision and the requirement to record leaks, visible tears, holes and cracks have been deleted.   | F.1, H.8,<br>and I.7                             | F.1, H.8,<br>I.10                                 | D.3.a, E.8,<br>and F.8                             | J.1, N.14,<br>and O.7                           |
| 9  | New waste disposal procedures have been added.  | F.3  | F.3   | D.3.c  | J.3   |
| 10 | Added a requirement to mark or label secondary containers.  | F.7  | F.7   | D.3.g  | J.7   |
| 11 | Revised the "specific use instructions" provision to be: material type, manufacturer's specific use instructions (e.g., specific use for which the material is intended), type operation (e.g., coating, stripping, or solvent cleaning), and, for coating operations, the coating type from [ . . . ]  | -  | H.1.c   | -  | O.1.c   |
| 12 | Modified the text to indicate: specific mixing data (e.g., component volumes or weights) of each component for each batch sufficient to determine the mixture's reactive organic compound content   | H.1.d  | H.1.d   | F.1.d<br>(solvents<br>only)                        | O.1.d   |

<sup>1</sup>The following terms were moved to Rule 102: aerospace product, avionic equipment, carbon adsorber, catalytic incinerator, electronic components, electrostatic spray, fluid system, grams of reactive organic compounds per liter of material, high-precision optics, high volume low pressure spraying equipment, natural draft opening, operating parameter value, reactive organic compound composite partial pressure, scientific instrument, thermal incinerator, transfer efficiency, & waste solvent residue. Staff deleted the *reactive organic compound* and *stationary source definitions*, which had indicated, "as defined in Rule 102, Definitions."

| Description of Change  | PAR 330 Section    | PAR 337 Section | PAR 349 Section | PAR 353 Section |
|--|--------------------|-----------------|-----------------|-----------------|
| 13 The waste disposal recordkeeping provision was modified.  | H.3                | H.3             | F.3             | O.3             |
| 14 Requirements to keep records on the volumes purchased, dates, and receipts have been deleted.   | H.3                | H.2             | F.2             | O.2             |
| 15 Changed the recordkeeping frequency to be daily when using noncompliant materials. The EPA “Guidance Document for Correcting Common VOC & Other Rule Deficiencies,” indicates daily records are to be required when a source uses noncompliant materials; monthly records are only acceptable for use of compliant materials. | H.5                | H.4             | B.1, F.4, & F.6 | B.9 & O.4       |
| 16 The record retention requirement now reflects two years unless a longer period is required by state or federal law.   | H.8 (had been H.9) | H.6             | F.7             | O.6             |
| 17 Added the SCAQMD 303-91 alternative test method.  | I.1                | I.1             | E.5             | N.2             |
| 18 Revised the compliance schedule.  | K                  | K               | G               | P               |
| 19 Moved the annual reporting provision into a separate section.   | L                  | L               | L               | S               |
| 20 Added a provision indicating that any solvent cleaning machines used need to comply with the applicable provisions of Rule 321.   | M                  | M               | M               | T               |

**II. TEXT CHANGES TO CLARIFY THAT PHOTORESIST COATING OPERATIONS ARE NOT SUBJECT TO RULE 330**

Electronic industry stakeholders pointed out that existing Rule 330 could be interpreted to be applicable to spin coating operations where photoresist coatings are applied to metal discs. Historically, neither industry nor the District has considered Rule 330 applicable to photoresist coating operations.

The stakeholders requested that the historical practice of not considering photoresist coatings subject to Rule 330 be codified into the proposed amended rule. Staff agreed and revised the project to make the application of photoresist coatings outside the scope of Rule 330; essentially providing a blanket exemption for photoresist coatings from Rule 330 (i.e., no recordkeeping, no reporting). Thus, the following definitions are being added to Rules 330 and 102:

Rule 330:

“Coating” means a material applied onto or impregnated into a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealers, and stains. For the purposes of Rule 330, photoresist coatings are not considered to be coatings. [Text bolded for emphasis.]

Rule 102:

“Photoresist Coating” means any coating applied directly to a substrate to protect surface areas when chemical milling, etching, or other chemical surface operations are performed on the substrate.

### III. MODIFICATION TO THE RULE 321.B.6 EXEMPTION

Existing Rule 321.B.6 could be interpreted to exempt *solvent cleaning* and *solvent cleaning machines* for the listed rules. Our intent was to exempt equipment and operations subject to the listed rules from only the Rule 321 *solvent cleaning* requirements. Hence, the project now includes a slight change to Rule 321.<sup>1</sup>

PAR 321 (Draft of February 15, 2012):

6. Any equipment or operation that is subject to or specifically exempted by any of the following District rules.

[. . .]

- d. Rule 337, Surface Coating of Aircraft or Aerospace Vehicles Parts and Products Components.

[. . .]

Notwithstanding this exemption, the applicable Rule 321 requirements apply if a rule for any above process specifies a solvent cleaning machine shall comply with the applicable provisions of Rule 321.

In addition, PARs 330, 337, 349, and 353 have been revised by:

- 1) Expanding the definition of “associated solvent” to include “solvent cleaning machines,”
- 2) Adding a definition of “solvent cleaning machine,” and
- 3) Including a general section at the end of each rule that indicates:

#### **Requirements - Solvent Cleaning Machine**

Any person who owns, operates, or uses any solvent cleaning machine shall comply with the applicable provisions of Rule 321, Solvent Cleaning Machines and Solvent Cleaning.

### IV. CHANGE TO RULE 353.H, SURFACE PREPARATION SOLVENT, TO DELETE THE SINGLE-PLY ROOFING SURFACE PREPARATION SOLVENT PROVISION

We removed the “single-ply roofing surface preparation solvent” provision consistent with other air district adhesive and sealant rules. The prior draft had allowed such operations to employ a solvent with a composite partial pressure of 45 mm Hg at 20°C or less.

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<sup>1</sup> The District plans to revise Rule 321 in the 2013-2015 timeframe to lower the solvent ROC-content limits and to address previous ARB and EPA comments.

**V. ADDITIONS TO THE AEROSPACE RULE EXEMPTIONS**

Staff added exemptions to Rule 337 as shown in the following table.

| <b>Description</b>   | <b>Exemption §</b> | <b>Exempt From:</b>   |
|--|--------------------|---|
| Wipe cleaning of breathing oxygen systems and components that are exposed to breathing oxygen  | B.9.e              | Section J.1.a - surface preparation and cleanup wipe cleaning operation provisions.                                   |
| Wipe cleaning and surface activation prior to adhesive bonding   | B.9.f              | Same as above.  |
| Wipe cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid   | B.9.g              | Same as above.  |
| Wipe cleaning of fuel cells, fuel tanks, and confined spaces   | B.9.h              | Same as above.  |
| Wipe cleaning or stripping during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft   | B.14.b             | Section D.2 - stripper limits and Section J.1.a - surface preparation and cleanup wipe cleaning operation provisions. |
| Wipe cleaning or stripping of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components | B.14.c             | Same as above.  |

These exemptions were modeled on exemptions listed in a USEPA Control Techniques Guideline (CTG) document and a federal regulation for the source category.<sup>1</sup>

**VI. CHANGES MADE PER EPA COMMENTS RECEIVED ON MARCH 23, 2012**

The District made the changes shown in the following table in response to EPA comments.

| <b>Rule and Section</b> | <b>Suggestion</b>   | <b>Response</b>   |
|-------------------------|---|---|
| 353.B.7                 | The exemption for cyanoacrylate adhesive should include provisions for work practices, such as storing and handling.  | 353.B.7 was modified to include compliance with Section J, Requirements - General Operating.      |
| 353.D and 353.E         | Lower the ROC-content limits on four products to those found in SCAQMD Rule 1168: multipurpose construction adhesive, other plastic cement welding, adhesives and sealants for fiberglass, and adhesives and sealants for porous materials. | The product's ROC-content limits were reduced as recommended with a 12-month compliance deadline. |

<sup>1</sup> "Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations," December 1997, and 40 CFR, Part 63, Subpart GG, Section 63.741 *et seq.*, "National Emission Standards for Aerospace Manufacturing and Rework Facilities."