

SUMMARY OF STAKEHOLDER COMMENTS ON PROPOSED AMENDED RULES 102, 202, 321, 330, 337, 349, AND 353 AND STAFF RESPONSES

ITEM No.	RULE & SECTION OR OTHER REF.	DOCUMENT OR RULE TOPIC	CONCERN, ISSUE, OR QUESTION (SOMETIMES PARAPHRASED OR CONDENSED)	COMMENT SUBM'D BY - FORM AND DATE	RESPONSE AND/OR ADDITIONAL INFORMATION
1	General Comments	Proposed amended Rules 330, 337, 349, and 353.	<p>The Rule changes as a whole are extensive and possibly too difficult for the regulated community to understand. [. . .]</p> <hr/> <p>Recommend refocusing the rules towards encouraging businesses in Santa Barbara County to emit less for example: by exempting zero VOC products from regulation.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>We are simplifying the “exemption” provisions. In general, the proposed amended rules are similar to those found in other air districts. Staff will continue to work with Industry to improve rule clarity.</p> <hr/> <p>We concur and propose several such de minimis-type exemptions:</p> <p>1. <u>Low-ROC Solvent Exemptions in proposed amended Rule (PAR) 330.B.8, 337.B.5, 349.B.2, and 353.B.11:</u></p> <p>This rule shall not apply to any cleaning performed with a solvent (including emulsions) that contains two percent by weight or less of each of the following:</p> <ul style="list-style-type: none"> a. Reactive organic compounds, and b. Toxic air contaminants (as determined by generic solvent data, solvent manufacturer’s composition data or by a gas chromatography test and a mass spectrometry test). c. Any person claiming this exemption shall maintain the records specified in Sections [<i>specific citations</i>] in a manner consistent with Section [<i>specific citation</i>] and make them available for review. <p>2. <u>Low-ROC Coatings in PAR 330.B.12 and 337.B.6:</u></p> <p>This rule shall not apply to coatings that contain less than 20 grams of reactive organic compound per liter (0.17 pounds of reactive organic compound per gallon) of coating, less water and less exempt compounds, as applied.</p> <p>3. <u>No ROC Materials in PAR 349.B.3:</u></p> <p>This rule shall not apply to polyester resin operations performed with polyester resin materials that contain no reactive organic compounds.</p>

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					<p>4. <u>Low-ROC Adhesives and Sealants in PAR 353.B.6:</u></p> <p>This rule shall not apply to adhesive products and sealant products that contain less than 20 grams of reactive organic compound per liter (0.17 pounds of reactive organic compound per gallon) of adhesive or sealant, less water and less exempt compounds, as applied. [Note: This exemption is in current Rule 353.B.1.g in a slightly different form.]</p>
2	General Comments	All rules.	SCAQMD rules are shorter, more concise and pointed towards the goal of assisting the regulated community. Recommend tightening of language in proposed SBCAPCD Rules consistent with SCAQMD Rules.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	The SC approach uses one rule that applies to solvent cleaning (Rule 1171) and the operation-specific or equipment-specific rules refer to that rule with regards to solvent cleaning provisions. The District decided not to take that approach. Instead, our approach is similar to the one taken by the San Joaquin Valley Unified APCD.
3	General Comments	All rules.	<p>Assure exemptions (Section B) and emission limits (from M Table 1) for aerospace vehicles, aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine propellant systems are identical to Rule 321 section B. and emission limits from Section M Table 1. [. . .]</p> <p>-----</p> <p>Therefore the emission limit for any solvent, resin, adhesive and sealant used around satellite and rocket propellant systems should be 900 grams per liter which conforms to Rule 321 Section B and M.1, Table 1.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>The exemptions and limits we are proposing in the rules are similar to those found in other air district rules. PAR 337.B.7 provides an exemption for solvent use associated with surface coating space vehicles. PARs 330.B.11.d, 337.B.9.b, 349.B.4.d, and 353.B.13.f provide an exemption for solvents used in the cleaning of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine).</p> <p>-----</p> <p>PAR 337.B.7 exempts space vehicle manufacturing and rework from the solvent cleaning and stripping provisions. For other aerospace vehicle solvent cleaning, the proposed lower limits (e.g., 200 g/l or composite partial pressure of 45 mm Hg @ 20° C) have been achieved in practice by sources in other air districts, are recommended by ARB/EPA, and are necessary to meet the requirement to adopt all feasible control measures.</p> <p>The District is planning to change Rule 321 limit's on aerospace solvent cleaning to 200 g/l, 45 mm Hg @ 20° C in the future.</p>

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4	General Comments	All rules.	References to VOC values should be listed "Regulatory Limit, as applied, in grams per liter (pounds per gallon)" e.g., 250 (2.1). Forms for annual reports are pounds per gallon but rule text only lists emission limits in g/l.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Per the October 6, 2011 telecon with VAFB, District staff will provide a table of the ROC limits for the four PARs and will list the limits in both grams per liter and pounds per gallon units where applicable.
5	General Comments	All rules.	Acetone is not always an acceptable solvent for cleaning substrates because it can infiltrate molecular voids of substrates such as aluminum and contaminate bonded (welded, soldered, sealed, adhered) surfaces.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	We have been unable to find any documentation that confirms your concerns. Acetone is just one compound that is commonly used in surface preparation. Other materials (e.g., AK-225, dimethyl carbonate, propylene carbonate) may be suitable for special cases such as the ones you mentioned.
6	General Comments	All rules. Also mentioned in reference to Rule 330.B.10.	Please reword the exemptions section for clarity. Suggest eliminating the double negatives. [. .]	VAFB, Kimberlee Harding, email of 09-09-2011	We have reworded the exemptions to eliminate the double-negative text.
			Not all businesses have professional environmental staff to read, reread, and interpret the rules.		Staff has reworked the rules with the intent to make them easier to understand. We are available to assist in training and providing guidance on implementation of the amended rule provisions. Please let us know if you are interested in these services or if you have specific suggestions to make the rules easier to understand.
7	General Comments	All rules.	Should go with 50 g/l now like with Rule 321. Could write the rule to require 50 g/l with a 25 g/l limit effective in the 2013 – 2015 timeframe shown in the CAP for Rule 321. The Background paper states in several places that solvents used in product preparation or clean-up must be 25 g/l, based upon comments from EPA and CARB. In fact Doug told me that this is where the majority of the emission reductions will occur. Doug informed me that the industry representatives were OK with that limit based upon comments from the February 2011 rules scoping meeting. However, my concern is that this proposed change is inconsistent with responses by the SBCAPCD to EPA and CARB during the Rule 321 rulemaking last fall and the 2010 CAP (See attached). Although most of the surrounding Districts have solvent limits at 25 g/l, the	Kevin Wright, phone call on 07-21-2011, and email of 07-25-2011	Doug gave Kevin our rationale for going with 25 g/l (one year implementation period, ARB/EPA comments, and other air district's already at 25 g/l). Further, there should be no big impact because we crafted the rules to have 1) specific exemptions, 2) higher ROC-content limits where appropriate, and 3) companies and agencies have met similar provisions in other air districts.

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			<p>SBCAPCD took a "first cut" or step-wise approach with an initial reduction to 50 g/l, and then reducing the limit to 25 g/l at a later date. The current proposal by the SBCAPCD for these coating rules would, in my opinion, cause an unequal enforcement situation, where sources regulated by Rule 321 would have a limit of 50 g/l and sources regulated by these rules would have a limit of 25 g/l. Note that this compromise in the Rule 321 rulemaking was made as a result of intense negotiations and it avoided any controversy at the Board level.</p>		
8	General Comments	Housekeeping and Reporting of Liquid Leaks, Visible Tears, Holes, or Cracks	<p>He does not like the provisions on leaks especially that they are a violation even if an operator finds the leak. Also he is concerned we will issue an NOV for any leak. This is mentioned in the "Clarification of Rule Issues," Page H-3 of the Background Paper:</p> <p><u>Question/Issue:</u> If a container has a liquid leak or if there is a liquid leak, visible tear, hole, or crack in application equipment, solvent distillation unit, or gun washer, has a violation occurred?</p> <p><u>Answer/Response:</u> Yes, a violation has occurred if a container has a liquid leak or application equipment, solvent distillation units, and gun washers have any liquid leaks, visible tears, holes, or cracks. The provisions indicate the repair is to be completed within one day from detection of a liquid leak, visible tear, hole, or crack, or the equipment is to be drained and shut down until repaired or replaced. If the operator does not comply with these requirements, another violation has occurred.</p>	Kevin Wright, phone call, 07-21-2011	<p>We have changed our approach on the rule provision and the Background Paper's Appendix I answer/response on this topic.</p> <p>Please see item 28a and item 36 for more details for more information.</p>
9	General Comments	Rules 330, 349, and 353	He does not think the rules apply to offshore platforms. The provisions in Rule 323, Architectural Coating, apply when doing coating operations on the platforms.	Plains Exploration and Production Co. (PXP), Glenn Oliver, verbal input During the	We agree.

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				Workshop or CAC Meeting on August 10, 2011	
10	General Comments	Background Paper	<p>The background paper states that 8.32 tons of ROC will be reduced with a potential savings of -\$5,308/ton to costing \$4,744/ton. This equates to a savings to the regulated community of \$44,163 to costing the community \$39,470.</p> <p>-----</p> <p>With the additional recordkeeping requirements, VAFB easily sees increased spending in excess of \$100,000/year to meet the additional recordkeeping requirements. Add in the additional costs for the more expensive, low VOC solvents to the recordkeeping spending and cost to VAFB will exceed \$150,000/year.</p> <p>-----</p> <p>It appears that the cost effectiveness data listed in Table 3 of District Backgrounds paper PARs 330, 337, 349 & 353 dated July 25, 2011 is missing the costs associated with finding and putting into service compatible replacement solvents, and other products used on aerospace vehicles, aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine propellant systems. [. . .]</p>	<p>VAFB, Kimberlee Harding, email of 09-09-2011</p> <p>-----</p> <p>Lockheed Martin, Kimberlee Harding, email of 09-09-2011</p> <p>and</p> <p>VAFB, Kimberlee Harding, email of 09-09-2011</p>	<p>It is inappropriate to simply multiply the 8.32 tons per year figure times the low and high cost-effectiveness figures to derive a cost range. Please refer to the data provided in response to item 11.</p> <p>-----</p> <p>Recordkeeping costs are generally not included in cost-effectiveness calculations because they do not directly relate to the equipment or material costs. We have provided costs estimates for increased recordkeeping and administrative tasks (e.g., annual reports) under the revised requirements.¹</p> <p>-----</p> <p>PAR 337.B.9 provides an exemption for solvents used in the cleaning of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine). Hence, no cost-effectiveness analysis is required in this area.</p>
11	General Comments	Background Paper	Please provide the cost-effectiveness documentation.	VAFB, Kimberlee Harding, email of 09-09-2011	The cost-effectiveness data can be provided. However, we prefer to first provide summarized data broken out for each control measure. And later, if further refined data is needed, we can provide the detailed worksheets.
12	102	Definitions	Will you be defining "avionics"?	Sherri Wentz, Raytheon, email of 09-06-2011	Staff added the following definition into Rule 102: <u>"Avionic Equipment" means any electronic system</u>

¹ As shown on Page J-2 of the July 25, 2011, Background Paper: The District estimates that the increased costs for complying with the amended recordkeeping provisions will be about \$1,000 per facility per year on the average. Also, there will likely be a slight increase in the administrative costs associated with preparing annual reports due to the changes in recordkeeping. This increase only affects permitted facilities and the District estimates it will be on the order of \$200 to \$300 per facility.

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					used on any aircraft, aerospace vehicle, satellite, or space vehicle.
13	202.D.10.1.2	Permit Exemptions	<p>The permit requirement for using more than one gallon t-butyl acetate is unwieldy. To require a permit to paint a steel bridge using a coating that contains tBAC in a quantity which exceeds the one gallon exemption is excessive and onerous to the regulated community.</p> <p>How will the District enforce this rule?</p> <p>In addition, the requirement is in direct conflict with D.14 which exempts the application of architectural coatings in the repair and maintenance of stationary structures. How will the District settle this conflict in the Rule? Request the District provide clarification.</p> <p>Tertiary butyl acetate (CAS#540-88-5) is not on the list of chemical known by the state of California to cause cancer. [. . .] Why has so much effort been spent of regulating it?</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>Please note that the tBAC permitting requirement was adopted on September 20, 2010 and the proposed Rule 202.D.10.1.2 amendment is minor. The following is in response to the questions posed.</p> <p><u>How is the Rule Enforced?</u> The District enforces the rule through spot-inspections, records kept per permit conditions (if applicable), and coordination with agencies that perform or contract for such superstructure painting operations.</p> <p><u>Conflicting Rule Provisions</u> Painting with tBAC in excess of 1 gal per year per stationary source will trigger a permit if the structure painted is part of a stationary source. Rule 202.D.10.1 indicates, “. . . notwithstanding any exemption defined in this rule, no stationary source . . .” Thus, D.10.1.2 overrides the D.14 provision and a permit is required if a structure is part of a stationary source. Otherwise, Rule 202.D.10.1 is not applicable and the operation is exempt by the spirit and intent of Rule 202.D.14.</p> <p>The Background Paper’s Appendix I, Clarification of Rule Issues, includes an item on this perceived conflict.</p> <p><u>Toxicity of Tertiary Butyl Acetate</u> According to an ARB Staff Report:</p> <p>“TBAC has been demonstrated to be substantially metabolized to tertiary-butyl alcohol (TBA) in rats. [. . .] This raises a concern that exposure to TBAC may result in a cancer risk to humans because of its metabolic conversion to TBA.”¹</p>

¹ Environmental Impact Assessment of Tertiary-Butyl Acetate, Staff Report, California Environmental Protection Agency, Air Resources Board, January 2006.

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			<p>EPA has called for additional toxicity testing. If the testing indicates that the concern of t-butyl acetate is not warranted, can and will the District reduce the requirements?</p>		<p>Also, EPA requires that tBAC be treated as a VOC in some instances. For these reasons we adopted provisions requiring permitting when a stationary source uses more than one gallon per year of this compound. This approach is similar to the one taken by SJV.</p> <p><u>Possibility of Repealing the Requirement</u> The District will consider providing a full exemption for tBAC if:</p> <ol style="list-style-type: none"> 1. EPA deletes the 40CFR Part 51.100 (s)(5) provisions for this compound, and 2. The ARB provides guidance indicating that tBAC should be listed as an exempt compound.
14	330.B.1 337.B.1	Exemptions	<p>Add yellow highlighted text to show:</p> <p><u>The provisions of</u> Section D shall not apply to any coatings with separate formulations used in volumes of less than 20 gallons <u>of each formulation per stationary source</u> in any calendar year.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>We concur. The present draft text reads, in part, “Section D shall not apply to any non-complying coatings with separate formulations used in volumes of less than 20 gallons of each non-complying formulation per stationary source in any calendar year.” And we added a definition of “non-complying coating” to PAR 330 and 337, which indicates:</p> <p>“Non-Complying Coating” means a coating with a reactive organic compound content above a limit specified in Section D.</p>
15	330.B.2	Exemptions	<p>The July 25, 2011 draft double-negative text is confusing.</p> <p>Also, operations involving touch-up and repair coatings and textured finishes should be exempt from the entire rule.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>Staff has removed the double-negative text. Please see item 17 for the current proposed text.</p> <p>We disagree that these coating operations should be exempt from the entire rule. EPA guidance indicates touch-up and repair and texture coatings should be exempt from the requirement to use certain application methods only. See item 17 for additional detail on the proposed amended 330.B.2 text.</p>

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16	330.B.2	Exemptions	<p>Change:</p> <ul style="list-style-type: none"> ♦"repair coatings" to "repair operations coating" so that this matches the exact verbiage in the definitions for "Touch-Up and Repair Operation". ♦"textured" to "textured coating" so that this matches that verbiage in the definitions for "Texture Coating." 	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	We changed the first term to be "touch-up and repair," changed the second term to be "texture coatings," and changed the Section C term to be "touch-up and repair." The next item has the current proposed 330.B.2 text.
17	330.B.2	Exemptions	<p>July 25, 2011 text:</p> <p><u>All provisions of this rule, except The provisions of Section DE, shall not apply to touch-up coatings, and repair coatings, and textured finishes.</u></p> <p>Request Section H be added to the exemption. Additional recordkeeping for small amounts of coatings is onerous and results in little air quality benefit.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>During an October 6, 2011 telecon, VAFB staff said:</p> <ol style="list-style-type: none"> 1. they record and report touch-up and repair coating usage rates and emissions per their permit conditions; and 2. the coatings they use comply with Section D. <p>Combining the above item 16 suggestions together with the VAFB request, the current proposed 330.B.2 text becomes:</p> <p><u>The provisions of Sections DE and H shall not apply to touch-up coatings, and repair and textured finishes coatings, provided Section D limits are met and records are maintained pursuant to a Permit to Operate.</u></p>
18	330.B.5	Exemptions	<p>The July 25, 2011 draft text is confusing.</p> <p>Request the text be left as in the January 20, 2000 version.</p>	<p>Lockheed Martin, Kimberlee Harding, email of 09-09-2011</p> <p>VAFB, Kimberlee Harding, email of 09-09-2011</p>	<p>We decided to keep the "aerosol coating products" exemption. Hence, the PAR text is now:</p> <p><u>This Rule shall not apply to coatings supplied in non-refillable as aerosol products in non-refillable containers having capacities of 18 ounces or less.</u></p>
19	330.B.5	Exemptions	The District should not require the use of nonrefillable aerosol cans to comply with any part of Rule 330.	Kevin Wright, phone call on 07-21-2011, email of 07-25-2011, Input During the Workshop &/or CAC Meeting on August 10, 2011	Please see the response to item 18 .

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20	330.B.10.d	Exemptions	Solid-film lubricants are listed as exempt from certain parts of Rule 330. However, they do not need to be listed as exempt as they are beyond the scope of the rule and therefore the rule should not apply.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	We disagree that solid-film lubricants are beyond the scope of the rule. SC Rule 1107(f)(1) and SJV Rule 4603.4.8 include a similar exemption. Also, exempting the items listed in PAR 330.B.10.d from the ROC limits and application method provisions is consistent with an EPA guidance document. ¹
21	330.B.11 (new) 337.B.13 (new)	Exemptions	Exempt zero ROC materials to encourage business to use them. Add the following exemptions: <u>Rule 330.B.11:</u> Metal parts and products coating operations where the coating contains no ROC or VOC materials. <u>Rule 337.B.13</u> Aerospace coating operations where the coating contains no ROC materials.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 1 .
22	330.B.XX	Exemptions	Exempt zero ROC and TAC materials to encourage business to use them. The new exemption could specify: This rule shall not apply to coatings that contain no ROC or TAC materials.	VAFB, Kimberlee Harding, email of 09-09-2011	Please see the response to item 1 .
23	330.B.11 (new)	Exemptions	The way PAR 330 B.4 currently reads, it does not clearly exempt "electronic components" as they apply to Raytheon operations.	Sherri Wentz, Raytheon, email of 09-06-2011	In response to this request, as refined through further discussions, we added exemption 330.B.11: 11. Section J.1 shall not apply to: a. Cleaning of semiconductor and microelectromechanical devices undergoing manufacturing processes involving thin film deposition, vacuum deposition, dry etching, or metal lift-off operations; including any maintenance activities associated with such operations; and

¹ Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, U.S. Environmental Protection Agency Office of Air Quality Planning and Standards Sector Policies and Programs Division Research Triangle Park, NC, EPA-453/R-08-003, September 2008.

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					<p><u>b. Cleaning of metal in electronic components; and</u></p> <p><u>c. Cleaning of encasements (e.g., decoy shells or box casings) for electronic components that have a total surface area that is less than 2 square feet and [. . .]</u></p>
24	330.B.XX (new) or 330.J 330.F	Exemptions	<p>Rule 330.J should indicate, “the solvent cleaning provisions do not apply to surface coating operations exempt by the rule.” Or, we should add and associated solvents to the aerosol exemption (330.B.5). Or, the rule should indicate that the solvent cleaning provisions do not apply to oil and gas processing operations.</p> <p>[. . .] although some sources may be exempt from the provisions of the rule (e.g. Rule 330, B.5), the SBCAPCD plans to revise this section and put in an exception for Section J, the solvent requirements. If a source is exempt from the rule, it should be exempt from the solvent cleaning requirements as well. Most residential and small use industrial sources are exempt under this spray can exemption. Is the District going to enforce this solvent limit on households? Note that industrial sources using this exemption will now be subject to solvent requirements even though use spray cans for metal parts coating. Some sources are now totally exempt from Rule 321 for wipe cleaning with no VOC limit, but if they do metal parts coating with spray cans at their stationary source, they will be subject to a 25 g/l limit for wipe cleaning in preparation and cleanup.</p> <p>Kevin Wright does not like all the housekeeping provisions and wants his clients to be exempt from them.</p>	<p>Kevin Wright, phone call on 07-21-2011, email of 07-25-2011, Input During the Workshop &/or CAC Meeting on August 10, 2011</p>	<p>During the phone, Doug responded by indicating:</p> <p>a. The applicability of Rule 330.J was already established by Rule 330.A and Rule 330.B. There is no need to add the statement the solvent cleaning provisions do not apply to surface coating operations exempt by the rule.</p> <p>b. I looked at adding and associated solvents provisions to the exemptions carefully and put it in where I thought it was appropriate and I followed what other air districts have in their rules. We want associated solvents to be subject to Rule 330 when painting with aerosol cans.</p> <p>c. I think the oil and gas processing industry should comply with the Rule 330 provisions when performing surface coating. Further, they could use acetone to meet their surface preparation cleaning requirements.¹</p> <p>With regards to the Rule 330 spray can exemption, we decided to keep it in the rule. For the current proposed amended text, please see item 18.</p> <p>We are revised the work practices provisions. Please see item 28a for more information.</p>

¹ Acetone use was later determined to be a concern due to its flammability. However, other products (e.g., diluted Chemco 33 S) have been used successfully in such environments.

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25	330.C	Definitions	<p>On the “extreme performance coating” definition, add:</p> <p>d. Exposure to fog, wet weather or water immersion.</p> <p>e. Aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine.</p>	Lockheed Martin, Kimberlee Harding, verbal input at the 08-10-2011 workshop and email of 09-09-2011	<p>Staff added “water immersion” to part “a” of the “Extreme Performance Coating” definition:</p> <p><u>a. Chronic exposure to corrosive, caustic or acidic agents, chemicals, chemical fumes, chemical mixtures or solutions (including water immersion).</u></p> <p>Adding “exposure to fog and wet weather” text is unnecessary because the definition’s “chronic exposure to corrosive, caustic or acidic agents” already covers the fog and wet weather situations. If requested, we will add an item to the “clarification of rule issues” to cover this concern.</p> <p>On the request to add exemptions in Rule 330 on “aerospace assembly and subassembly surfaces” etc., the PAR 330.B.6.a exemption is sufficient. It indicates Rule 330 does not apply to coating operations and associated solvent use that are subject to Rule 337.</p> <p>Hence, Rule 330 does not apply to “aerospace assembly and subassembly” painting operations, but Rule 337 does. And Rule 337 is only applicable to such surfaces when performing coating operations (including application of adhesives and sealants). Further, for cleaning operations not associated with coating operations, Rule 321 applies.</p>
26a	330.C	Definitions	Clarify the definition of “Extreme Performance Coating.” Revise to include exposure to water and the harsh marine environment in the definition.	VAFB, Kimberlee Harding, email of 09-09-2011	<p>See above response.</p> <p>Note: SC Rule 1107(i) has an approval process for using extreme performance coatings.¹</p>
26b	330.D & 330.J.1	Limits	The Rule 321 and Rule 337 limits should be included in Rule 330 because our company makes items that could be subject to Rule 337 upon use. For example, we make infrared	Lockheed Martin, Kimberlee Harding, email of 08-18-2011	If proposed exemptions in Rules 330 and 337 do not remove this concern, the District may respond to this concern in the Background Paper’s Appendix I, Clarification of Rule Issues.

¹ SC Rule 1107(i) text: **Qualification for Classification as Extreme-Performance Coating.** A coating may be classified as an extreme-performance coating provided that the applicator requests and receives written approval of such classification from the Executive Officer, or designee, prior to application of such coating, and shows that the intended use of each coated object would require coating with an extreme-performance coating.

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			sensors that could be used in earth-based operations or in space.		Rule 101, Compliance by Existing Installations: Conflicts, provides guidance. This rule indicates, in part, "Whenever more than one rule of these Rules and Regulations applies to any article, machine, equipment or other contrivance, the rule or combination of rules resulting in the smallest rate or lowest concentration of air contaminants released to the atmosphere shall apply."
27	330.F.1 337.F.1 349.D.3.a 353.J.1	Requirements - General Operating	<p>The PAR text includes a requirement for waste solvent residues to contain less than 20 percent of reactive organic compound by weight. This is managing hazardous waste. Please cite the District's regulatory authority to manage hazardous waste.</p> <p>The referenced proposed provision is shown below.</p> <p>After distillation recovery of solvent, waste solvent residues shall not contain more than 20 percent of reactive organic compound by weight as determined by the test method specified in Section . . .</p> <p>Why is the District concerned with the ROC content of waste residue? When the waste is in a sealed container as required by hazardous waste regulations, there are no emissions. At the treatment storage and disposal facility (TSDF), the container will be incinerated to meet disposal standards and result in less CO2 and ROC emissions than drying the residues with electrical energy to less than 20 percent ROC and then incinerating the drier residue.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>The following addresses different aspects of the comment.</p> <p><u>The District's Authority to Manage Hazardous Waste Pursuant to Health and Safety Code Section 40001</u>, air pollution control districts have long standing authority to regulate air emissions from the handling and disposal of:</p> <ul style="list-style-type: none"> • wastes containing solvents, and • waste solvent residue. <p>Local and regional air quality management district and air pollution control districts ("districts") are created pursuant to Division 26 of the Health and Safety Code.¹ Under the statutory scheme, the districts have been given the primary authority to regulate air pollution from nonvehicular sources. In particular, Section 39000 states, "local and regional authorities have the primary responsibility for control of air pollution from all sources other than vehicular sources." Section 40000 has similar language. Section 39002 provides that ". . . local and regional authorities may establish stricter standards than those set by law or by the state board for nonvehicular sources." Section 41508 also states that "except as specifically provided in this [Division 26] . . . any local or regional authority may establish additional, stricter standards than those set forth by law or by the state board for nonvehicular sources."</p>

¹ All further section references in this item are to the Health and Safety Code.

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					<p>The Santa Barbara County APCD has adopted several rules that include provisions on reducing air emissions from solvent wastes:</p> <ol style="list-style-type: none"> 1. Rule 321, Solvent Cleaning Machines and Solvent Cleaning (specifically 321.D.1). 2. Rule 339, Motor Vehicle and Mobile Equipment Coating Operations (specifically 339.8.e). 3. Rule 354, Graphic Arts (specifically 354.D.6). <p>In addition, the District has the authority to implement and enforce the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). One of these is particularly relevant to this discussion: 40 CFR 63.680, Subpart DD - National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.</p> <p>Therefore, the District has the authority to regulate air emissions from waste solvents and solvent waste residues, whether this is done in a rule specifically aimed at regulating toxics or as part of amendments to a rule whose primary purpose is the control of criteria pollutants.</p> <p><u>Basis for Limiting the Maximum ROC Content in Solvent Residues</u></p> <p>There are potentially significant emissions from improper disposal of waste residue, which have been minimized by setting a maximum ROC content of the material. The Rule 321.D.1 provision on the maximum allowable ROC content in solvent residue stems from an ARB model rule. According to the support document for that model rule:</p> <p>The Environmental Protection Agency estimates that 16.5 percent of the total emissions from degreasing operations are from improper disposal of waste solvents. Improper disposal routes include storing solvents in unsealed containers and dumping solvents into drains or onto the grounds surrounding a facility. The most environmentally sound</p>

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					<p>approach to waste solvent disposal is solvent reclamation.</p> <p>However, we have reconsidered the need to add the requirement that the solvent residue have ≤ 20 percent ROC content into the PARs. In light of the new requirements to use low-ROC solvents we have decided to not add the provision, but include more-specific disposal and disposal recordkeeping provisions.</p> <p>Please see item 28a for the new waste disposal method requirements and item 36 for the amended waste disposal recordkeeping provisions.</p>
28a	330.F.3 , 337.F.3, 349.D.3.c, and 353.J.3	Requirements - General Operating	<p>The text should be changed as follows:</p> <p><u>All application equipment, solvent distillation units, and gun washers shall not have any liquid leaks, visible tears, holes, or cracks. Any such liquid leak, visible tear, hole, or crack is a violation of this rule.</u></p> <p>The manufacturer of a brush designs in a hole in the handle to hang the brush. Since there is a visible hole in the handle of the brush, is the owner in violation of the rule?</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>We decided that the following provisions adequately address leaks, use of equipment that is in proper operating order, use of proper closure devices, and the handling of spills:</p> <p>330/337.F.1, F.2, F.4, and F.5; 349.D.3a, D.3.b, D.3.d, and D.3.c; and 353.J.1, J.2, J.4, and J.5</p> <p>Further, the prior proposed “liquid leaks, visible tears” etc. text was redundant and could be deleted.</p> <p>In its place, we added provisions to minimizing emissions from waste material:</p> <p><u>Waste solvent, waste solvent residues, and any other waste material that contains reactive organic compounds shall be disposed of by one of the following methods:</u></p> <p><u>a. A commercial waste solvent reclamation service licensed by the State of California.</u></p> <p><u>b. At a facility that is federally or state licensed to treat, store or dispose of such waste.</u></p> <p><u>c. Recycling in conformance with Section 25143.2 of the California Health and Safety Code.</u></p>

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					The amended provision ties-in with revised waste disposal recordkeeping provisions to help ensure waste disposal emissions are minimized. Please see item 36 for more details.
28b	330.F.7, 337.F.7, 349.D.3.g (new), and 353.J.7	Requirements - General Operating	<p>The PAR text should be changed as shown in the yellow highlights:</p> <p><u>Any container storing storage of any usable compound subject to this rule shall only be done in containers that meet the labeling labeled per the requirements of Section G.</u></p> <p>Hazardous waste containers that contain compounds subject to the Rule should not be required to be labeled in accordance with G.1 and G.2. What date of manufacture, thinning requirements, and maximum ROC content is put on the drum when there are numerous different products in the container?</p>	<p>VAFB, Kimberlee Harding, email of 09-09-2011</p> <p>VAFB, David Savinsky, verbal input during the 01-10-2012 stakeholder meeting.</p>	<p>We agree that solvent/coating waste labels should be different than manufacturer labels. Hence, we have changed the PARs “general operating” labeling requirement to be:</p> <p><u>Containers used to store coating, solvent, or any waste material that contains reactive organic compounds subject to this rule shall be marked or clearly labeled indicating the name of the material they contain.</u></p> <p>We also added an item to Appendix I on the level of detail that is needed for the secondary marking/labeling.</p>
29	330.H.1, 3, 4, 6.a, and 6.b 337.H.1, 2, 4, 6, and 8.a 349.F.1, 2, and 6 353.O.1 and 2	Recordkeeping	<p>Keeping records for an entire stationary source where there are multiple facilities would be extremely difficult.</p> <p>Additionally, commercial sources on VAFB should not be required to maintain information and records of their potential competitors or have access to possible proprietary information.</p> <p>The various operators, both government and contractor on VAFB should not be required to maintain records for totally unrelated equipment and processes.</p>	<p>Lockheed Martin, Kimberlee Harding, email of 09-09-2011</p> <p>VAFB, Kimberlee Harding, verbal input at the 08-10-2011 workshop and email of 09-09-2011</p>	<p>The District agrees and proposes the following lead-in text to the recordkeeping provisions:</p> <p><u>Any Persons-person</u> subject to this Rulerule shall comply with the following requirements. <u>Any owner or operator of any stationary source comprised of more than one facility may comply with the following requirements on a facility basis.</u></p>

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30	330.H.1.d 337.H.1.d 353.O.1.d	Recordkeeping	<p>What is the significance of recording “volumes of each component for each batch” instead of the “Ratio”?</p> <p>-----</p> <p>Do we need to define what a “Batch” in Rule 102 or Rules 330, 337, 353?</p> <p>-----</p> <p>I think this might mean having daily records for each time we mix a batch.</p>	<p>United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011</p> <p>-----</p>	<p>The District needs to know the volumes of each component when operators mix batches to determine compliance with the rule’s as applied ROC limits.</p> <p>Please refer to the San Diego County APCD calculation methods available at this link http://www.sdapcd.org/SBA/VOCproce.pdf for further detail on the need to have volume data.¹</p> <p>-----</p> <p>We don’t think a “batch” definition is needed. We can simply rely on this dictionary definition: “Batch” means the quantity of material prepared or required for one operation.</p> <p>-----</p> <p>Yes, if a batch is mixed daily, then daily records are needed.</p>
31	330.H.1.f 337.H.1.f 349.F.1.f 353.O.1.f	Recordkeeping	<p>The current draft indicates:</p> <p>Maintain a current <u>listing file</u> of all reactive organic compound-containing materials <u>in use at the stationary source</u> subject to this <u>Rule</u>. <u>The file shall provide all of the data necessary to evaluate compliance and shall include the following information, as applicable: [. . .]</u></p> <p><u>f. current coating and solvent manufacturer specification sheets, Material Safety Data Sheets, or air quality data sheets, which list the reactive organic compound content of each material in use at the stationary source subject to this rule.</u></p> <p>-----</p> <p>It is unreasonable and potentially unsafe and confusing to maintain the current coating and solvent manufacturer specification sheets, MSDS, or AQ data sheets for every material used at VAFB at each location on VAFB. The current specification sheet might be the wrong specification sheet for the product in use at that particular location. For example, we might</p>	<p>VAFB, Kimberlee Harding, email of 09-09-2011</p> <p>-----</p>	<p>Maintaining manufacturer specification sheets, air quality sheets, or MSDS is a current rule requirement (Rules 330.H.4, 337.H.2, and 353.O.1.a). In addition, we encourage sources to have such information available as part of their overall safety program.</p> <p>-----</p> <p>Current coating and solvent manufacturer specification sheets, Material Safety Data Sheets, or air quality data sheets may be maintained on a stationary source basis. If sources choose to maintain air quality data sheets instead of MSDSs, there should be no emergency and first aid procedures specified.</p> <p>To alleviate this concern, we have added the yellow</p>

¹ Volatile Organic Compound (VOC) Calculations, Procedures for Calculating VOC Content of Mixtures When Water or Exempt Compounds are Present.

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			<p>have an older, compliant product, at one facility, and the manufacturer has reformulated the product, which is used at another facility, and generated a new specification sheet. The first facility needs the “old” information while the second facility needs the “new” information. If there is an accident at the either location and the wrong data sheets are used, there is a potential that the wrong medical treatment may be used to treat the victim of the accident.</p>		<p>highlighted text below (stems from the SJV Rule 4605.6.1.1 provision):</p> <p>current coating and solvent manufacturer specification sheets, Material Safety Data Sheets, product data sheets, or air quality data sheets, which list the reactive organic compound content of each material in use at the stationary source subject to this rule. An operator may comply with this provision by ensuring the manufacturer’s specifications are listed on the product container.</p>
32	330.H.2	Recordkeeping	<p>The current draft indicates:</p> <p>For each industrial maintenance-extreme performance or electric-insulating varnish coating, maintain on a monthly basis a list record of each part or product coated on a monthly basis. The record shall specify whether each part or product was air dried or baked.</p> <p>Please delete this requirement. How does the monthly listing of items coated with an extreme performance or electric-insulating varnish coating improve air quality? Unnecessary recordkeeping only serves to increase costs for the regulated community.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>This provision is similar to the existing Rule 330.H.2 requirement. However, we have reconsidered this provision and decided to obtain information on the coating categories and equipment coated in 330.H.1.c. The new text (shown below) requires the source to maintain a file that includes:</p> <p>material type (e.g., air dried or baked enamel, powder coating, extreme performance coating, cleanup solvent, etc.) type operation (e.g., coating, stripping, or solvent cleaning), and, for non-powder coating operations, the coating type, drying method, and equipment coated;</p> <p>The intent is to have documentation of the coating categories from Rule 330.D.1 and 2 with specificity of the drying method and the articles they were used on.</p> <p>The 330.H.2 provision now indicates “[Reserved].”</p>
33	330.H.3 337.H.2	Recordkeeping	<p>Revise the text to show:</p> <p>Maintain purchase records identifying the type or name and the volume of material purchased for each reactive organic compounds-containing material, purchased for use at the stationary source individual facility.</p> <p>Keeping records for the entire source such as VAFB is not reasonable and may not be possible. See comment to H.1 (item 29) above.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 29 .

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34	330.H.3.c, d, and e 337.H.2.c, d, and e 349.F.2.c, d, and e 353.O.2.c, d, and e	Recordkeeping	New requirements to maintain and provide additional purchasing records as specified in c, d, and e are excessive. Compliance should be based on emissions from the volume of materials used or issued to the floor for a given time period and not the quantity purchased. Materials may be purchased in bulk and remain at a site for a year or more before use. Environmental specialists review and approve initial requisitions for materials and may not have access to actual dates of purchase and purchase receipts.	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	The District deleting subsections “c,” “d,” and “e;” to make this section read: Maintain purchase records identifying the type or name and the volume of material purchased for each reactive organic compounds-containing material- purchased for use at the stationary source. The records shall include, but not be limited to, the following: <u>a. material name and manufacturer identification (e.g., brand name, stock identification number); and</u> <u>b. material type (e.g., air dried or baked enamel, powder coating, extreme performance coating, cleanup solvent, etc.);</u>
35	330.H.4	Recordkeeping	Revise the text to show: <u>Maintain records of the method of disposal each time waste solvent or waste solvent residue is removed from the stationary source individual facility for disposal.</u> Keeping records for the entire source such as VAFB is not reasonable and may not be possible. See comment to H.1 <u>(item 29)</u> above.	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to <u>item 29</u> .
36	330.H.4, 337.H.3, 349.F.3, and 353.O.3	Recordkeeping	Waste disposal records should only be required if the source is using a mass balance approach to demonstrate compliance. If the source is not subtracting waste disposal as a means of reducing emissions, disposal records should not be necessary. There is rarely a direct correlation between emissions and waste disposal unless a batch-loaded cleaning system is filled and then emptied in the same year. Waste solvents are often diluted with paints or oils and may be disposed of in different years than they were issued. The District should require an approved “Solvent Recovery Plan” as referenced in certain air permits for those sources which choose this as a compliance	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	We disagree. Waste disposal records are used as a method to ensure ROC emissions on and off the source’s site are minimized through proper disposal. Permitted sources have District-approved solvent recovery plans to substantiate reduced stationary source emissions. The current proposed amended waste disposal recordkeeping provisions read: Maintain records of the disposal method each time waste solvent, waste solvent residue, or other waste material that contain reactive organic compounds is removed from the stationary source for disposal.

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			measure.		This provision, coupled with the requirement to use the proper disposal methods discussed in item 28a , will help ensure waste disposal emissions are minimized.
37	330.H.5 337.H.4 349.F.4 353.O.4	Recordkeeping	Create separate "Reporting Condition." The annual reporting requirement at the end of Rule 353.O.4, and any other reporting requirements buried in the rule should be a separate reporting condition to simplify locating the requirements in the rule.	VAFB, Kimberlee Harding, email of 09-09-2011	We now indicate the annual report requirement separately, at the end of the rule.
38	330.H.6.a 337.H.7.a	Recordkeeping	Revise the text to show: Daily records of the volumes of non-compliant coating materials used by each separate formulation at the stationary source individual facility . Keeping records for the entire source such as VAFB is not reasonable and may not be possible. See comment to H.1 (item 29) above.	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 29 .
39	330.H.6.b	Recordkeeping	Revise the text to show: Annual running totals, from January 1 of each calendar year, of the volume of non-compliant coating materials used at the stationary source individual facility for: Keeping records for the entire source such as VAFB is not reasonable and may not be possible. See comment to H.1 (item 29) above.	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 29 .
40	330.H.7 337.H.6	Recordkeeping	The July 25, 2011 proposed text indicates, " For any stationary source that uses . . ." This could be changed to, " For any stationary source or separately by permitted sources that uses . . ."	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 29 .
41	330.H.8 337.H.8 349.F.8	Recordkeeping	The July 25, 2011 text indicates, " If an operator or District staff discovers a liquid leak in a container holding coating or solvent, or a liquid leak, visible tear, hole, or crack in application equipment, a solvent distillation unit, or in a	VAFB, Kimberlee Harding, email of 09-09-2011	Consistent with our revised approach for minimizing waste disposal emissions, we deleted the provision. Please see item 28a and item 36 for more details.

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	353.O.7		<p>gun washer, the operator shall record. . .”</p> <p>Remove this condition. The additional recordkeeping is excessive and only provides added compliance burden to the regulated community with little benefit to air quality. An operational requirement to maintain equipment according to manufacturer’s specifications and to repair any visible leaks should suffice. This should be no different than requiring a lid to be kept closed on a parts washer or paint can.</p>		
42	330.H.9 337.H.6 349.F.6 353.O.5	Recordkeeping	<p>What is the reason for keeping records readily available for review for two (2) additional years? If the District is inspecting our permits at least every 2 years, recordkeeping issues should be resolved with that inspection. As busy as inspectors are, I can't imagine spending time reviewing records 4-5 years old. Are there problems with having records for three (3) years to review?</p>	<p>United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011</p>	<p>Sources with a Title V, Part 70 Operating Permit (and others) may be required to keep records for a total of five years. However, we reconsidered this provision and revised it to indicate:</p> <p>Any records required to be maintained pursuant to this rule shall be kept on site for at least two years unless a longer retention period is otherwise required by state or federal regulation(s). Such records shall be readily available for inspection and review.</p> <p>Further, we decided to add a “Clarification of Rule Issues” item indicating:</p> <p>Records need to be maintained for five years if a source is subject to:</p> <ol style="list-style-type: none"> 1. Rule 370, Potential to Emit - Limitations for Part 70 Sources, or 2. Rule 1301, Part 70 Operating Permits - General Information, or 3. A MACT standard.

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43	330.J	Requirements - Solvent Cleaning	Add to paragraph title "for Metal Parts and Products" so that when operators are reviewing this part of the rule it is more clear they are reviewing Rule 330 solvent cleaning requirements and not another Rule's solvent cleaning requirements.	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	We modified the text to show: J. Requirements – Solvent Cleaning Associated with Surface Coating of Metal Parts and Products
44	330.J	Requirements - Solvent Cleaning	Table 1's title Change "Table 1" to "Table 330-1" (like Rule 337 and Rule 353 numbers their tables).	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	Please see the response to item 45 .
45	330.J	Requirements - Solvent Cleaning	Add to paragraph title "Metal Parts and Products" after "Cleaning."	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	Staff added text to the title to make it, "Table 330-1: Reactive Organic Compound Content Limits for Solvent Cleaning Associated with Surface Coating of Metal Parts and Products."
46	330.J	Requirements - Solvent Cleaning	Table 1 (a). Add "Metal Parts and Products" before "Surface."	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	The text now shows: Metal Parts and Products Surface Preparation for Coating Application
47	330.K 337.K 353.P	Compliance Schedule	Add text to show that the recordkeeping provisions become effective one-year after the rule adoption. This is a very quick compliance schedule for developing a file of coating used across a stationary source and methodologies for distributing and updating hundreds of manufacturer specifications sheets, Material Safety Data Sheets, and air quality data sheets and purchase and hazardous waste records. <u>From the comment on Rule 353:</u> Implementing new requirements can be time consuming. VAFB recommends a 1 year compliance deadline or phase in period.	VAFB, Kimberlee Harding, email of 09-09-2011	In general, sources should already be in compliance with the provisions to maintain manufacturer specification sheet, MSDSs, or air quality sheets per existing Rule 330.H.4, 337.H.2, and 353.O.1.a requirements. We are providing a six-month compliance deadline for the new recordkeeping provisions. The new recordkeeping provisions, as related to Rule 330, include: <ul style="list-style-type: none">• H.1.d - mixing data,• H.1e - ROC content limit and actual as applied ROC content limit,• H.3 - purchase records, and• H.4 - waste disposal records. This approach is similar to the one used in Rule 321.
48	337.B.1	Exemptions	Could change the text: 1. Any noncompliant coatings with separate formulations used in volumes of less than 20 gallons <u>of each formulation</u> per stationary source in any calendar year...	VAFB, Kimberlee Harding, email of 09-09-2011	We deleted the "Except as otherwise specifically provided herein, the provisions of this rule shall not apply to the following:" text. The following shows the revised lead-in text to the 337.B subsections mentioned by VAFB:

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			<p>2. Touch-up and repair, except Section E.</p> <p>This format simplifies the text and makes it easier to read and will increase the chance of voluntary compliance. Please consider rewording B.7, 9, 10, 11, and 12 similarly.</p>		<p>1. Section D shall not apply to any ... 2. Section E shall not apply to ... 7. Section D.2 and J.1.a shall not apply to ... 9. Section J.1.a shall not apply to ... 10. Section E shall not apply to ... 11. The chemical milling maskant limits in Section D.1, Table 337-1, shall not apply to ... 12. Section D.1 shall not apply to ...</p>
49	337.B.2	Exemptions	The text is confusing.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	We agree and have changed it as shown in the next item.
50	337.B.2	Exemptions	Change "repair" to "repair operations coating" so that this matches the exact verbiage in the definitions for "Touch-Up and Repair Operation."	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	<p>We left the Rule 337.B.2 term unmodified, but changed the Section C "touch-up and repair operations" term to "touch-up and repair." Staff also changed 337.B.2 to add §H, which is similar to the 330.B.2 change (discussed in item 17). PAR 337.B.2 now reads:</p> <p>The provisions of Section E- and H shall not apply to touch-up and repair, provided Section D limits are met and records are maintained pursuant to a Permit to Operate.</p>

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51	337.B.3 & 337.B.13 (new)	Exemptions	<p>Need to exempt aerosol containers. The following exemption should be included:</p> <p>Coatings supplied in non-refillable aerosol containers having capacities of 18 ounces or less.</p> <p>Keep the term "non-refillable" in the exemption.</p>	<p>Lockheed Martin, Kimberlee Harding, email of 09-09-2011</p> <p>PXP, Glenn Oliver, verbal input at the 12-12-2012 stakeholder meeting.</p>	<p>We agree that coatings supplied as aerosol products should be exempt as well as coatings subject to the California consumer products regulations.</p> <p>Hence, the Rule 337.B.3 text now reads:</p> <p>The provisions of this rule shall not apply to coatings (including adhesive products and sealant products) supplied in non-refillable as aerosol products in non-refillable containers with capacities of 18 ounces or less.</p> <p>Further, a new Rule 337.B.13 exemption indicates:</p> <p>This rule shall not apply to coatings (including adhesive products and sealant products) subject to the Air Resources Board consumer products regulation found in Title 17 of the California Code of Regulations, section 94507 et seq.</p>
52	337.B.7	Exemptions	<p>Add "Aerospace Vehicle or Component" to list including "Space Vehicle"</p> <p>ULA is requesting that the text be changed to show:</p> <p>Section D.2 and J.1.a shall not apply to solvents and strippers used in aerospace vehicle or component and space vehicle manufacturing and rework.</p>	<p>United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011</p>	<p>We disagree. This change is inconsistent with the exemption we used for a model (SC Rule 1124(1)(4)). In addition, it exempts solvents and strippers that the rule needs to regulate.</p> <p>The ROC content limits in D.2 (stripping - 300 g/l) and J.1.a (solvent cleaning 200 g/l or 45 mm of Hg at 20 °C) would become meaningless with the added text. Stripping operations and solvent cleaning operations associated with surface coating of aerospace vehicles and components other than space vehicles have met the proposed provisions in other air districts.</p>
53	337.B.9.c	Exemptions	<p>Also, regarding PAR 337 and the impacts to our decoy shells and box casings for electronic components, similar exemption language as is found in PAR 353 B.13, (specifically "avionics") would be great.</p>	<p>Sherri Wentz, Raytheon, email of 09-06-2011</p>	<p>To address this concern, we added the following subsection c to PAR 337.B.9 :</p> <p>a. Cleaning of encasements (e.g., decoy shells or box casings) for electronic components that have a total surface area that is less than 2 square feet; and [. . .]</p> <p>d. Solar cells, laser hardware, scientific instruments, high-precision optics, telescopes, microscopes,</p>

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					avionic equipment, and military fluid systems.
54	337.C	Definitions	"Adhesive Bonding Primer". This should read exactly like Rule 353's definition of "Adhesive Bonding Primer."	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	<p>We disagree; the Rule 337 adhesive bonding primer categories are for aerospace specialized coatings. Whereas, the Rule 353 adhesive bonding primers are for general purpose. After review this issue, we changed the Rule 353 term to be "adhesive primer" because "adhesive bonding primer" is not used in Rule 353.</p> <p>The District-proposed changes to the Rule 337 definition of "adhesive bonding primer" makes it consistent with an EPA guidance document.¹</p>
55	337.C	Definitions	"Adhesive Bonding Primer". Not sure we need to have "thin film" in this definition; we should be following the manufacturer's specifications on how to apply material.	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	The District prefers to keep the "thin film" wording in the definition. It is in the definition found in an EPA guidance document.
56	337.C	Definitions	<p>Why is the District changing the definition of coating in Rule 102 to this "new" definition?</p> <p><u>"Coating" means any material that is applied to the surface of an aerospace vehicle or component to form a decorative, protective, or functional solid film, or the solid film itself. Adhesives, sealants, and lubricative material are types of specialty coatings.</u></p> <p>Please remove mention of adhesives, sealants, and lubricative material from the definition.</p> <p>-----</p> <p>Two old documents from EPA, their 1997 CTG and the 1998 40 CFR, Part 63, Subpart GG, Section 63.741 et seq., National Emission Standards for Aerospace Manufacturing and Rework Facilities include adhesive and sealants as specialty coatings while the newer, 2008 40 CFR, Part 63, Subpart HHHHHH, Section 63.11169 et seq., National Emission Standards for Hazardous Air Pollutants: Paint Stripping</p>	<p>VAFB, Kimberlee Harding, email of 09-09-2011</p> <p>-----</p>	<p>We need a Rule 337-specific definition of "coating" to comply with ARB and EPA requirements.</p> <p>The first sentence of this definition is directly from EPA documents (CTG for Aerospace Mfg and Rework Operations and 40CFR63.742). The second sentence is added for ease of understanding that these materials are "specialty coatings."</p> <p>We need to implement the limits from the EPA aerospace CTG to meet the EPA RACT requirements.</p> <p>-----</p> <p>EPA referenced these "old" documents in their June 2009 Technical Support Document for SJV Rule 4605 and during recent discussions with staff.</p> <p>Regardless of 40CFR63.11180 excluding adhesives, sealants, maskants, and caulking materials, EPA's aerospace CTG includes limits for adhesives, sealants, maskants, and solid film lubricants. Hence, we are required to incorporate them into Rule 337.</p>

¹Control Techniques Guideline for Coating Operations at Aerospace Manufacturing and Rework Operations (December 1997). The modified term is also similar to the one found in 40 CFR Part 63, Subpart A, Appendix A.

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			and Miscellaneous Surface Coating Operations at Area Sources specifically excludes adhesives, sealants, maskants, or caulking materials from the definition of coating. The ----- District should streamline the solvent rules to regulate all adhesives and sealants in Rule 353.		This would be inconsistent with the approach used by other air districts, the EPA aerospace CTG, and request from other industry representatives. ----- We decided to delete the "adhesive bonding primer" term from Rule 353 as it is not used in that rule.
57	[Reserved]				
58	337.H.8.a	Requirements - Recordkeeping	The July 25, 2011 text indicates, ". . . used by each separate formulation at the stationary source. " This should be changed to, ". . . used by each separate formulation at the stationary source or separately by permitted source. "	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 29 .
59	337.H.9 349.F.8 353.O.7	Requirements - Recordkeeping	Delete the requirement to report liquid leaks, visible tears, holes, or cracks in application equipment, etc. Spill/leak recordkeeping and reporting is under the purview of the Certified Unified Program Agencies (CUPA). The requirements should not conflict with CUPA jurisdiction & probably shouldn't be in this rule.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	This recordkeeping provision has been deleted because the related "general operating" requirement to repair leaks, visible tears, etc. has been removed. See item 28a for additional information.
60	337.J	Requirements - Solvent Cleaning	Add "Aerospace Vehicle or Component" so that when operators are review this part of the rule it is more clear they are reviewing Rule 337 Aerospace Vehicle or Component requirements and not another Rule's solvent cleaning requirements.	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	We modified the text to be: J. Requirements – Solvent Cleaning Associated with Surface Coating of Aerospace Vehicles and Components
61	337.J.1	Solvent Requirements	Make a table that looks like Rule 330's J.1, Table 1 so that there are consistent looking tables between this rule and rule 330 and 353 for example. This table should also be numbered "Table 337-3" if a table is generated.	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	This is possible. We are not sure additional rule clarity would be gained by such changes.
62	337.J.1.a	Solvent Requirements	Must assure Section J is consistent with Rule 321.M.1 ROC content limits. (Document goes on to show the solvent cleaning activity and limits from Rule 321's Table 1 relative to aerospace vehicles, payloads, satellites, etc.)	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 3 .
63	337.J.1.a	Solvent Requirements When Performing Surface Preparation for	This section seems to contradict Rule 321 M.1., which allows for 900 g/l for cleaning Aerospace parts and components and does not specify whether the cleaning is in preparation for	United Launch Alliance, Mark Inguaggiato, letter of 08-23-2011	No conflict exists between Rule 321 and the proposed amended Rule 337. Rule 321.B.6.d exempts operations involving surface coating of aircraft and aerospace vehicle parts and products. Rule 337

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		Coating Application and Cleanup (Other than Spray Application Equipment Cleaning)	Coating Application or any other specific operation. Why is the ROC content limited to 200 g/l in the Aerospace Rule when Rule 321 allows 900? J.1.a should be deleted.		<p><u>applies</u> to the surface coating of aerospace vehicles and components.</p> <p>ARB and EPA have recommended that the Rule 321.M.1 provisions for aerospace vehicles be changed to 200 g/l. And the District has such a change planned for future rule development.¹ The proposed lower limits have been achieved in practice by sources in other air districts and are necessary to meet the requirement to adopt all feasible control measures.</p>
64	349.B.3 (new)	Exemptions	<p>Add the following exemption:</p> <p><u>Provisions of Section D. shall not apply to the following applications:</u></p> <p><u>Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine.</u></p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	We agree, see item 65 for the current proposed text.
65	349.B.4 (new)	Exemptions	<p>Add the following exemption:</p> <p><u>Provisions of Section D [should be Section H] shall not apply to the following:</u></p> <p><u>a. Cleaning of solar cells, laser hardware, scientific instruments, high-precision optics, telescopes, microscopes, avionic equipment, and aerospace and military fluid systems; and</u></p> <p><u>b. Cleaning in laboratory tests and analyses, including quality assurance and quality control applications, bench scale projects, or short-term (less than 2 years) research and development projects; and</u></p> <p><u>c. Cleaning during the production, repair, maintenance, or servicing of satellites, satellite components, aerospace vehicles, aerospace vehicle components, aerospace vehicle payloads, or aerospace vehicle payload</u></p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>To address these concerns, staff added the following Rule 349.B.4 - 6 exemptions:</p> <p><u>4. Section H shall not apply to polyester resin operations production or rework of the following products: [. . .]</u></p> <p><u>d. Cleaning of parts, assemblies, or subassemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, or hydrazine); [. . .]</u></p> <p><u>f. Cleaning of solar cells, coated optics, laser hardware, scientific instruments, high-precision optics, telescopes, microscopes, avionic equipment, and aerospace and military fluid systems; [. . .]</u></p> <p><u>5. Section H shall not apply to polyester resin operations production or rework of the following products, provided the solvents used contains 200 grams of reactive organic compound per liter of material or less or have a composite partial pressure of a 45 millimeter of mercury at 20 degrees Celsius:</u></p>

¹ The requirement will be for the solvent to meet either a 200 g/l ROC content limit or have a composite vapor pressure of a 45 mm of Hg at 20°C.

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			components.		<p>a. Satellites, satellite components, aerospace vehicles, aerospace vehicle components, aerospace vehicle payloads, or aerospace vehicle payload components.</p> <p>6. Section H shall not apply to polyester resin operations production or rework of products used in any laboratory tests or analyses, including quality assurance or quality control applications, bench scale projects, or short-term (less than 2 years) research and development projects. To qualify for this exemption, the following records shall be maintained:</p> <p>a. A list of all solvents used, which at a minimum includes the manufacturer's identification and the reactive organic compound content of each solvent.</p> <p>b. For each short-term research and development project, the project description, date it commenced, and date it concluded.</p> <p>c. Such records shall be retained in accordance with the provisions of Section F.7.</p>
66	349.B.5 (new)	Exemptions	<p>Add the following exemption:</p> <p>Commercial and or industrial polyester resin operations where the polyester resin contains no ROC materials.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 1 .
67	349.H	Solvent Requirements	Solvent cleaning requirements should be in line with Rule 321. (Document includes Table 1, which shows the solvent cleaning activity and limits from Rule 321's Table 1 relative to aerospace vehicles, payloads, satellites, etc.)	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 3 .

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68	353.B.3	Exemptions	<p>July 25, 2011 PAR text, “All the provisions of this rule, except Sections D, E, G.1, and H, shall apply to any Adhesives products, adhesive bonding primers, adhesive primers, sealants, sealant primers products, and any associated solvent or any other primers being tested or evaluated used in any laboratory tests or analyses, including quality assurance or quality control applications, bench scale projects, . . .”</p> <p>Recommend the text be changed to, “All adhesive products, sealant products, and any associated solvent used in any laboratory tests or analyses, including quality assurance or quality control applications, bench scale projects, . . .”</p> <p>This format simplifies the text and makes it easier to read and will increase the chance of voluntary compliance. Please consider rewording B.7, 9, 10, 11, and 13 similarly.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>We deleted the confusing text: “Except as otherwise specifically provided herein, the provisions of this rule shall not apply to the following:”</p> <p>The lead-in text to the following 353.B subsections now shows:</p> <p><u>For 353.B.1, 2, 4 - 8, 11, and 12:</u></p> <p>This rule shall not apply to . . .</p> <p><u>And for the other Sections:</u></p> <p>3. Provisions of Sections D, E, G.1, and H, shall not apply to any . . .</p> <p>9. Except for Section K (Prohibition of Sales), this rule shall not apply . . .</p> <p>10. The sales prohibition in Sections K.1 and K.2 of this rule shall not apply to . . .</p> <p>13. Provisions of Sections G.1, H, and R shall not apply to . . .</p>
69	353.B (new)	Exemptions	<p>Add the following to assure the exemptions are in line with Rule 321:</p> <p>Provisions of Section H shall not apply to the following applications:</p> <p>Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine.</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 73 .

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70	353.B.8	Exemptions	<p>The text is confusing and difficult to determine what the exemption is about. Further, 16 fluid ounce containers should be exempt to assure items available at local stores can comply.</p> <p>-----</p> <p>How do you get emission reductions by going from 16 ounce- to 8 ounce-containers?</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>We have modified the text to show:</p> <p><u>This rule shall not apply to Adhesives products and adhesive bonding primers, adhesive primers, sealants, sealant primers products, or any other primers,</u> which are sold or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less.</p> <p>-----</p> <p>We talked with EPA on their prior recommendation and received an OK to leave the exemption at 16 ounces.</p>
71	353.B.8	Exemptions	<p>Current Rule 353 exemption, “Adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, which are sold or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less.”</p> <p>Request this exemption remain exactly as in the August 19, 1999 version of this rule. Many products are not available in containers that small which would force the regulated community to attempt to find substitutions that may or may not meet their needs and will increase costs if the smaller sizes are available. The added requirements are onerous and result in little air quality benefit.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	See response to the above item.
72	353.B.13	Exemptions	Need to assure the exemption is in line with the Rule 321 exemption. (The provided suggested text change showed a deletion of the Section H, Surface Preparation Solvent, requirement, which would make that provision applicable.)	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	<p>The following revised 353.B.13 text is consistent with Rule 321 provisions:</p> <p><u>Provisions of Sections G.1, H, and R shall not apply to solvents and strippers used on the following:</u></p> <p><u>a. Solar cells, laser hardware, scientific instruments, high-precision optics, telescopes, microscopes, avionic equipment, and military fluid systems; and</u></p> <p><u>b. Cotton swabs when removing cottonseed oil before the cleaning of high-precision optics; and</u></p> <p><u>c. Paper gaskets; and</u></p>

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					<p>d. Clutch assemblies where rubber is bonded to metal by means of an adhesive.</p>
73	353.B.14 (new)	Exemptions	<p>Need to assure the exemption is in line with the Rule 321 exemption. Add: Cleaning of aerospace assembly and subassembly surfaces</p> <p>a. that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen, or hydrazine.</p> <p>b. Transport Equipment (e.g., railcars, trucks, trailers, forklifts, and containers), and</p> <p>c. Support Processing Equipment (e.g., clean rooms, tools, payload fairing fixtures, alignment jigs, fuel and oxidizer loading carts and associated transfer lines).</p>	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	We disagree that a new exemption is needed in Rule 353; the PAR 353.B.5.a exemption is sufficient for aerospace vehicle and component cleaning operations. Under the 353.B.5.a exemption, Rule 353 does not apply to coating operations and associated solvents that are subject to Rule 337. When applying paints, adhesives, and sealants on aerospace vehicles and components , Rule 353 does not apply. For aerospace vehicle and component cleaning operations not associated with coating operations, Rule 321 applies.
74	353.B.14 (new)	Exemptions	Need to assure the exemption is in line with the Rule 321 exemption. Add: Commercial and or industrial adhesives and sealants where the adhesive or sealant contains no ROC materials.	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	See the response to item 1 .
75	353.C	Definitions	<p>The July 25, 2011 text shows:</p> <p>“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, adhesive products, paints, varnishes, sealant products, and stains.</p> <p>Remove mention of adhesive products and sealant products from the definition.</p> <p>Why is the District changing the definition of coating in Rule 102 to this “new” definition? Two old documents from EPA, their 1997 CTG and the 1998 40 CFR, Part 63, Subpart GG, Section 63.741 et seq., National Emission Standards for Aerospace Manufacturing and Rework Facilities include adhesive and sealants as specialty coatings while the newer, 2008 40</p>	VAFB, Kimberlee Harding, email of 09-09-2011	See the response to item 56 .

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			<p>CFR, Part 63, Subpart HHHHHH, Section 63.11169 et seq., National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources specifically excludes adhesives, sealants, maskants, or caulking materials from the definition of coating. The District should also streamline the solvent rules to regulate all adhesives and sealants in Rule 353.</p>		
76	353.H	Requirements - Surface Preparation Solvent	Add Rule 321 Table 1 provisions listed below. (Document includes Table 1, which shows the solvent cleaning activity and limits from Rule 321's Table 1 relative to aerospace vehicles, payloads, satellites, etc.)	Lockheed Martin, Kimberlee Harding, email of 09-09-2011	Please see the response to item 3 .
77	353.N.2	Requirements – Compliance Provisions and Test Methods	<p>The July 25, 2011 draft indicates, “Exempt organic compounds shall be determined using ASTM D4457-1991”</p> <p>Please change the method to SCAQMD Method 303.</p> <p>Why is the District requiring the use ASTM D 4457-1991, “Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph,” instead of the more readily available SCAQMD Method 303 (Determination of Exempt Compounds)? Please change the method to SCAQMD Method 303.</p>	VAFB, Kimberlee Harding, email of 09-09-2011	EPA correspondence dated July 5, 2011 recommended that we refer to the ASTM D4457-1991 method per the guidance in the “Little Bluebook” for enforceability issues. ASTM D4457 is listed in 40CFR60.17. However, we found that EPA has allowed air districts to reference the SC Method 303 as an equivalent monitoring method. Hence, we added the SC method as an alternative method for determining exempt compounds in 330.I.2, 337.I.1, 349.E.5, and 353.N.2.
78	353.N.14 330.I.7 337.I.10 349.E.8	Requirements – Compliance Provisions and Test Methods	<p>The July 25, 2011 draft indicates, “Solvent waste residue reactive organic compound content shall be determined by using Environmental Protection Agency Reference Method 25D or an equivalent method approved by the Environmental Protection Agency, the Air Resources Board, and the Control Officer.”</p> <p>Remove this requirement. Please remove this requirement or cite the District’s authority to</p>	VAFB, Kimberlee Harding, email of 09-09-2011	<p>This test method is being removed because the requirement for the ROC solvent content of the waste solvent residue not exceeding 20 percent is being eliminated.</p> <p>On the “authority to regulate hazardous waste” issue, please see the response to item 27.</p>

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			regulate hazardous waste.		
79	337.J.2	Requirements - Solvent Cleaning	For clarity, please change the phrase ... from "50 grams per liter of material..." to "50 grams of reactive organic compound per liter..."	USEPA, Technical Support Document for Rule 321, received on 10-03-2011	As applied to PAR 337 with the 25 g/l limit, staff made the following change (shown in yellow highlight): ... <u>25 grams of reactive organic compound per liter of material</u> . . .
80	337.J.2.a	Requirements - Solvent Cleaning	Also, subsection M-2-a would be more complete if the requirement to store wipes in containers was added.	USEPA, Technical Support Document for Rule 321, received on 10-03-2011	Staff made the following change to PAR 337.J.2.a (shown in yellow highlight): <u>Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply, and where wipes are stored in closed containers to prevent evaporation when not in use;</u>
81	330.B.5 and 337.B.3	Aerosol Coatings Exemption	Keep the "non-refillable" text in the exemption.	PXP, Glenn Oliver, verbal input during the stakeholder meeting on 12-12-2011	Done.
82	330.H.9, 337.H.6, 349.F.6, and 353.O.5	Recordkeeping	What is meant by "readily available"? We are concerned that we would have to spend some time to gather them and that the inspectors will want the records immediately.	VAFB, David Savinsky, verbal input during the stakeholder meeting on 01-10-2012	<i>Readily available</i> generally means within 24 hours. We have added an item to Appendix I, Clarification of Rule Issues, which covers this topic.
83	102	Definition	The proposed definition of "avionic equipment" should have the word "spacecraft" replaced with "space vehicle" for consistency.	United Launch Alliance, Mark Inguaggiato, verbal input during the 01-10-2012 stakeholder meeting	Agreed, staff changed the text.
84	330.B.11, 337.B.9, 349.B.4, & 353.B.13	Exemptions	Need to add the "exposed to strong oxidizer" exemption text to each of the rules.	Lockheed-Martin, Karen Newsom, verbal input during the stakeholder meeting on 01-10-2012	Staff concurred with this suggestion and added the exemption to all four rules.

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85	330.B.11, 337.B.14, 349.B.4, 349.B.7, & 353.B.13	Exemptions	We found acetone damages painters face masks when cleaning off the overspray from them.	VAFB, David Savinsky, verbal input during the stakeholder meeting on 01-10-2012	The District decided that an exemption for such small use should be provided.
86	330.I.1, 337.I.1, 349.E.5, and 353.N.2	Test methods for determining ROC contents.	Most test labs are using the SCAQMD Method 303-91 to determine exempt compounds. Hence, the District should add this test method as an alternative to the ASTM International method.	VAFB, David Savinsky, verbal input during the stakeholder meeting on 01-10-2012	The District agreed with this suggestion and made the appropriate additions to the four rules. In addition, staff included a definition of the test method in Rule 102 in a manner similar to the earlier proposed SCAQMD method 313-91.
87	330.H.1.d, 337.H.1.d, 349.F.1.d, & 353.O.1.d	Recordkeeping	In the recordkeeping section of the different rules, there is the requirement to record the mix ratio volumes. We understand the need to have information, but can the District add the option for a weight ratio?	VAFB, David Savinsky, email dated 02-28-2012	Yes; we modified the provisions to be: 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; [PAR 349.F.1.d is slightly different as it deals with only solvent mixes.]
88	330.A, 330.C	Applicability of Rule 330 to Photoresist Coatings, Definition of <i>Coating</i>	Rule 330 was not intended to apply to photoresist coatings. There should be an exemption or other provision to clarify that the application of photoresist coatings to metal discs are not subject to Rule 330 provisions.	Raytheon, Sherri Wentz, SB Focalplane, Amy Estrella, and Innovative Micro Technology, Cynthia Holm, verbal input during the 03-01-2012 stakeholder meeting.	The District agrees; we added this sentence to the definition of <i>Coating</i> : For the purposes of Rule 330, photoresist coatings are not considered to be coatings. Staff also added a definition of <i>photoresist coatings</i> to Rule 102.
89	330.D.4.a, 337.D.3.a, 349.D.1.f.i, and 353.I.1 330.I.7, 337.I.10, 349.E.8, and 353.N.14	Add-on Control System Overall Efficiency - Alternative Test method for ROC concentrations in parts per million by volume	When the control system operates without ROC's in the inlet stream (e.g., during shift changes, equipment idling/maintenance), it is difficult to maintain the minimum overall efficiency. The rules should have a minimum parts per million provision alternative.	Raytheon, Jim Hardin, verbal input during the 03-01-2012 stakeholder meeting.	This approach has been used in permitting and in other air districts. Hence, staff added the alternative 10 ppmv provision with a text method into each of the four rules.

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90	353.B.9	200 Pounds per Year Exemption	The way the District drafted the revised exemption, associated solvent and stripper emissions are included in the 200 lb/yr aggregate for determining if the exemption threshold has been exceeded. It is not fair to also include solvent and stripper emissions from exempt operations.	Raytheon, Sherri Wentz, and SB Focalplane, Amy Estrella, verbal input during the 03-01-2012 stakeholder meeting.	Rulemakers concur and added the following to the exemption. Associated solvents and strippers used for operations that are exempt per Sections B.1 - B.4, B.11, and B.13 shall not be included in calculating the total reactive organic compound emissions under this exemption.
91	337.H.1.c & 353.O.1.c	Recordkeeping	What is meant by <i>specific use instructions</i> ? Maybe it is meant to be the manufacturer's specific use instructions .	Raytheon, Sherri Wentz, verbal input during the 03-01-2012 stakeholder meeting.	Staff research indicated that the term was added in response to an EPA comment. And it should be the manufacturer's specific use instructions and it should specify the use for which the material is intended. Hence, the text was changed to reflect this.
92	330.H.1.d, 337.H.1.d, 349.F.1.d, & 353.O.1.d	Recordkeeping	On the mixing data, my facility mixes paints, adhesives, and epoxies following the manufacturers' recommended amounts for each component and the manufacturers provide the "as applied" ROC content data for the mixed products. Will maintaining the manufacturer's mixing data meet the rule requirements on recording specific mixing data for each batch?	Raytheon, Sherri Wentz, verbal input during the 03-01-2012 stakeholder meeting.	Yes; and the District added an item to Appendix I to cover this concern.
93	337.J.1.b and 337.M	Cleaning Application Equipment	We use solvent wash stations that have capacities greater than 1 gallon to clean application equipment. Will this activity be allowed under the proposed amended rules?	C&D Zodiac, Matt Weber, verbal input during the 03-19-2012 stakeholder meeting	If a solvent has an ROC content greater than 25 g/l, Rule 337.J.1.b allows the use of an enclosed cleaning system. Since a solvent wash station is not an enclosed cleaning system, the wash station needs to comply with Rule 321 provisions (via 337.M). We understand that C&D Zodiac is using acetone in the application equipment cleaning process. Acetone has zero ROCs and zero TACs. Hence, acetone does not meet the definition of a solvent and may be used to clean the application equipment without regard to compliance with Rule 337 or Rule 321 (i.e., the rule's do not apply). Acetone is a flammable substance and its use needs to conform to other agency regulations.
94	337.D.2 and 337.J.1	Aerospace Stripping and Solvent Cleaning	We occasionally use small amounts of MEK. Will that be allowed under PAR 337?	C&D Zodiac, Matt Weber, and Art-Craft Paint, Teresa Venegas, verbal input during the 03-19-2012 stakeholder meeting	Not as drafted. Staff found applicable exemptions in 40 CFR Section 63.744(e) and added them to 337.B.14. These exemptions cover wipe cleaning and stripping when working on 1) upholstery, curtains, carpets, etc., and 2) honeycomb cores.

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95	321	PAR 321	Reiteration of the comments in the July 29, 2011 Technical Support Document for Rule 321.	USEPA, Andrew Steckel, comments dated 03-23-2012	The District has such changes scheduled for the 2013-2015 timeframe in the 2010 CAP.
96	330.C, 337.C, 349.C, and 353.C	Definitions	<p>The definitions of <i>reactive organic compound</i> and <i>stationary source</i> should be deleted. They simply refer to the definitions in Rule 102 and the <i>Definitions</i> section has the lead-in sentences:</p> <p>See Rule 102, Definitions, for definitions not limited to this rule. For the purposes of this rule, the following definitions shall apply:</p>	USEPA, Andrew Steckel, comments dated 03-23-2012	Agreed.
97	330.B.1, 330.H, 337.B.1, 337.H, 349.B.1, 349.F, 353.B.9, and 353.B.O	Exemptions for Noncompliant Materials and Recordkeeping	At a minimum, daily recordkeeping should be required for noncompliant materials and monthly recordkeeping for compliant materials	USEPA, Andrew Steckel, comments dated 03-23-2012	Agreed.
98	353.B.7, 353.D and 353.E	Exemption and ROC-Content Limits	The superglue exemption should be changed to require compliance with the work practices. Several adhesive and sealant categories should have lower ROC-content limits.	USEPA, Andrew Steckel, comments dated 03-23-2012	Agreed.