

LISTING OF STAKEHOLDER CONCERN CATEGORIES WITH CROSS-REFERENCES TO ITEMS IN  
THE SUMMARY OF STAKEHOLDER COMMENTS ON PARs 102, 202, 321 330, 337, 349, & 353

GENERAL CATEGORY	SUBJECT	ITEM(S) COVERED IN COMMENT NUMBER(S)	GENERAL RESPONSE / NOTES
<b>Exemptions</b>			
	Clarification of the exemption text.	1, 6, 14, 15, 16, 48, 49, 66, 68, & 70	We deleted the double-negatives.
	Aerosol coatings exemptions.	18, 19, 24, 51, & 81	These are maintained.
	8 vs. 16 ounces exemption for adhesive/sealant products.	70 & 71	Kept at 16 ounces.
	Exempting zero ROC and zero TAC materials from the rules.	1, 21, & 22	Addressed in various ways (e.g., < 2% prov's).
	Cleaning of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers.	3, 64, 65, 69, 73, & 84	Item resolved.
	Exempting touch-up and repair.	15 & 50	Partial rule exemp'n.
	Additional exemptions in the fibreglassing rule.	64 & 65	Done.
	Making Rule 353 exemptions consistent with Rule 321 exemptions.	72 & 73	We disagree that add'l changes are needed.
	Request to exempt solid-film lubricants.	20	Not done.
	Request to exempt aerospace vehicle and components from the Rule 337 stripper and solvent cleaning provisions.	52	Not done.
	Provide exemptions for the solvent cleaning of avionic equipment, electronic components, decoy shells, and box casings.	23, 53, & 83	Done.
	Cleaning personal protection equipment.	85	Done.
	Revising the Rule 353.B.9 exemption to exclude ROC emissions from stripping/solvents exempt by other provisions	90	Done.
	Exempt aerospace upholstery operations and manufacturing of honeycomb structure from stripping and solvent cleaning requirements	94	Done.
<b>Recordkeeping</b>			
	Stationary source vs. facility records.	29, 33, 35, 38, 39, 40, & 58	Issue resolved.
	Waste disposal records.	36	We disagree.
	Requirement to record leaks, visible tears, etc.	59	Deleted.
	Need to Have MSDSs.	31	Issue resolved.
	Container labels	28b	Issues resolved.
	Purchase records.	34	Deleted subject's c - e.
	User-mixed coatings and solvents and records for each batch.	30, 87, & 92	Explanations & confirmations provided.
	Clarification of <i>specific use instructions</i> records.	91	Issue resolved.
	Recording monthly volumes of "extreme performance" and "electric-insulating varnish."	32	Alternative provision proposed.
	Waiving the recordkeeping provisions for touch-up and repair operations.	17	Agreed.
	Maintaining records: 2 years vs. 5 years and meaning of "readily available."	42 & 82	Revised.
	Daily records for noncompliant materials.	97	Revised.
<b>Waste Handling</b>			
	District's authority to regulate wastes.	27 & 78	Citations provided.
	Provision on a 20 percent maximum ROC content in the solvent residue.	27 & 78	Deleted.

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<b>Work Practices</b>			
	Hole in paint brush (liquid leaks, visible tears, holes, or cracks provision).	8, 24, 28a, & 41	Provision deleted.
	Storing solvent laden wipes in containers when not in use.	80	Item resolved.
	Application of superglue should be subject to the work practices provisions.	98	Exemption changed accordingly.
<b>Costs and Cost-Effectiveness</b>			
	Costs associated with finding replacement solvents for surfaces exposed to strong oxidizers and reducers was not included.	10	No costs - the rules exempt such cleaning operations.
	Additional VAFB recordkeeping and alternative solvent costs.	10	Response provided.
	Request to provide cost-effectiveness documentation.	11	Summary available.
New Solvent ROC Limits	Rule 321 solvent cleaning limits vs. the PARs solvent ROC-content limits.	3, 7, 62, 63, 67, 74, & 76	Need the lower limits in 330, 337, 349, and 353.
<b>New Solvent Cleaning Provisions</b>			
	Use of acetone as a substitute (not always suitable).	5 & 24	Noted.
	Expand the title of the section to be more descriptive.	43	Done.
	Cleaning application equipment.	93	Acetone is an exempt compound and is not subject to the PARs.
Add-On Control System Efficiency	An alternative to the overall control efficiency should be provided. Sometimes the inlet ROC ppmv concentration is low due to shift changes, production bottlenecks, etc.	89	Issue resolved.
Permit Exemptions	Use of t-butyl acetate.	13	Response provided.
<b>Definitions</b>			
	"Touch-up and repair operation" changed to "touch-up and repair."	16 & 50	Changes made for consistency.
	Extreme performance.	25 & 26a	Change made.
	Rule 337 and Rule 353 definition of "adhesive bonding primer" should be the same. Also, the Rule 337 terms includes "thin film," which may not be necessary.	54 & 55	We disagree, but changed the PAR 353 term to <i>adhesive primer</i> .
	Coating definition and the inclusion of adhesives, sealants, and lubricative materials	56 & 75	Explanation provided. Deletions not made.
	Delete <i>reactive organic compound</i> and <i>stationary source</i> from Section C, Definitions.	96	Done.
Annual Report	Stand alone reporting requirements.	37	Done.
Compliance Schedule	Expanding the compliance schedule to include other new provisions.	47	Done.
<b>ROC Limits</b>			
	Units used for limits.	4	Aside from Rule 337, most rules list limits in both units.
	Table of Rule 330, 337, 349, and 353 ROC limits.	4	Provided.

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Test Method			
	Change the method for determining exempt compounds.	77 & 86	SC Method 303-91 added.
	Specifying a test method for solvent waste residue ROC content.	78	The test method has been deleted.
Minor Rule Edits	Add rule number to table numbers, modify titles to be explicit for the rule, etc.	12, 44, 45, 46, 60, 61, 79, & 80	Done.
Applicability			
	Rule 330 vs. Rule 323 when painting on offshore platforms.	9	Agree.
	Rule 353 should regulate all adhesives and sealants, including those used on aerospace vehicles and components.	56	Disagree.
	Applicable limits when products have end uses in both aerospace and land-based equipment. Possible conflict between Rule 321 and 337.	26b & 63	When there is overlapping applicability, Rule 101 applies. We disagree that there is a conflict between Rule 321 and PAR 337.
	Rule 330 should not apply to the application of photoresist coatings.	88	Agreed.
General Comments	The rules are complicated. SCAQMD Rule 1171 is shorter and the District should consider using the same approach.	1 & 2	Responses provided.