

COMPARATIVE ANALYSIS

**PROPOSED AMENDED RULE 67.6.1 – COLD SOLVENT CLEANING
AND STRIPPING OPERATIONS
AND RULE 67.6.2 VAPOR DEGREASING OPERATIONS**

Statutory Requirements

Prior to adopting, amending, or repealing a rule or regulation, California Health and Safety Code Section 40727 requires findings of necessity, authority, clarity, consistency, non-duplication, and reference, as defined therein. As part of the consistency finding and to ensure proposed rule requirements do not conflict with or contradict other Air Pollution Control District (District) or federal regulations, Health and Safety Code Section 40727.2(a) requires the District to perform a written analysis identifying and comparing the air pollution control standards and other provisions of proposed amended Rule 67.6.1 and Rule 67.6.2 with existing or proposed District rules and guidelines and existing federal rules, requirements, and guidelines applying to the same source category.

Analysis

Proposed amended Rule 67.6.1 and Rule 67.6.2 apply to cold solvent cleaning and stripping operations, and vapor degreasing operations, respectively. The proposed amended exempt degreasers with low or no volatile organic compound (VOC) emissions from rule requirements and include a lower, more health-protective, solvent emission limit consistent with analogous rules of other California air districts. Additionally, the proposed amendments address minor deficiencies identified by the U.S. Environmental Protection Agency (EPA) that require correction to assure federal approval of the rules.

Comparison with Existing District rules and regulations

District New Source Review (NSR) Rule 20.2 – Non-Major Stationary Sources, applies to any new or modified vapor or cold solvent cleaning and stripping operation. Rule 20.2 requires that any non-major new or modified emission unit that has a post-project potential to emit of 10 pounds per day or more of VOC be equipped with Best Available Control Technology (BACT). For vapor and cold solvent cleaning and stripping operations, BACT is identified as either the use of an add-on emission control system or, if such system is determined to be not cost-effective, compliance with the requirements of current Rule 67.6.1 or Rule 67.6.2. Since the proposed amended rules contain lower VOC content limits for solvent materials than those in the existing rules, the proposed limits will become the new BACT requirements.

Comparison with federal Control Techniques Guidelines

Control Techniques Guidelines (CTG) for Industrial Cleaning Solvents (2006) applies to facilities that emit more than 15 pounds per day of VOC and has a solvent material VOC content limit of 50 grams per liter. Proposed amended Rule 67.6.1 and Rule 67.6.2 specify a solvent material VOC content limit of 25 grams per liter and does not have an emission-based applicability threshold.

Conclusion

There are no conflicts or contradictions between proposed amended Rule 67.6.1 and Rule 67.6.2, and BACT requirements. Also, no conflicts exist between proposed amended Rule 67.6.1 and Rule 67.6.2 and the CTG for Industrial Cleaning Solvents.