NOTICE OF WORKSHOP
FOR DISCUSSION OF PROPOSED AMENDMENTS TO
RULE 67.16 - GRAPHIC ARTS OPERATIONS

The San Diego County Air Pollution Control District will hold a public meeting to consider a proposed amendments to Rule 67.16 - Graphic Arts Operations. Comments regarding the proposed amendments may be submitted in writing before, or made at the workshop, which is scheduled as follows:

DATE: February 28, 1991
TIME: 8:30 a.m.
PLACE: Farm Advisor's Conference Room
County Operations Center
Building #4
5555 Overland Avenue
San Diego, CA 92123

The amendments to Rule 67.16 correct deficiencies with the rule that have been identified by the Environmental Protection Agency. They also broaden the applicability of the rule and add new requirements to provide additional emission reductions. The proposed amendments will accomplish the following:

- Clarify that the rule applies to the coating of flexible packaging materials for food or health care products.
- Clarify that operations subject to Rule 67.16 do not have to comply with Rule 66.
- Reduce the exemption level for the graphic arts facility from 19.9 to 15 pounds per day.
- Add additional compounds that are exempt from regulation because they are not ozone precursors.
- Revise the VOC definition consistent with other District rules and EPA requirements. Also, the method of determining VOC content has been specified.
- Delete definitions that are no longer needed.
- Clarify that specified VOC limits are to be expressed as "less water and exempt compounds".
- Delete the option of compliance using coatings containing no more than 25% VOC. The District is unaware of anyone that is currently using this option to comply with the rule.
- Add new requirements for the cleanup of equipment, consistent with other District rules.
- Add language to prohibit the reformulation of graphic arts materials to increase the methylene chloride or CFC content.
• Add language to require that the methylene chloride and CFC content of graphic arts materials be specified on the material container.

• Revise control equipment requirements (if used for compliance), consistent with other District rules.

• Make certain clarifications to the rule and delete language that is out of date and no longer needed.

• Add requirements that records of specified information be kept on a daily basis and that such records be maintained for at least three years.

• Specify test methods that will be used to determine compliance with the rule.

If you would like a copy of the proposed amendments to Rule 67.16, please call Juanita Ogata at (619) 694-3307. If you have any questions concerning the proposal, please call Natalie Zlotin at (619) 694-3312 or me at (619) 694-3303.

Richard J. Smith
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Deputy Director

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