

**NOTICE OF WORKSHOP
FOR DISCUSSION OF PROPOSED AMENDMENTS
TO DISTRICT RULE 11
EXEMPTIONS FROM PERMIT REQUIREMENTS**

The San Diego County Air Pollution Control District will hold a public meeting to consider amendments to Rule 11 Exemptions From Permit Requirements. Comments regarding the proposed amendments may be submitted in writing before, or made at the workshop, which is scheduled as follows:

DATE: November 7, 1990
TIME: 1:00
PLACE: Farm Advisor's Conference Room
County Operations Center
Building #4
5555 Overland Avenue
San Diego, CA 92123

The proposed amendments to Rule 11 are as follows:

- Section (d)(8) is amended to eliminate the exemption from permit requirements for ovens used for curing, softening or annealing plastics. This exemption is being deleted because plastic manufacturing and fabrication processes are exempt from permit requirements pursuant to Section (i)(3).
- Section (d)(5), coking extrusion equipment and certain asbestos manufacturing processes, and (d)(30), processes involving the cutting, grinding, sanding, etc. of materials containing asbestos or carbon fibers, are amended to eliminate the exemption from permit requirements. Such processes may emit toxic or hazardous air contaminants and must be evaluated by the District.
- Section (i) which exempts certain processes using materials containing volatile organic solvents has been amended to delineate and clarify the recordkeeping requirements necessary to substantiate the applicability of each exemption.
- Section (d)(10) is amended to replace the existing weight criteria with a volumetric capacity criteria for crucible, pot or induction furnace operations on various molten metals. The use of a volumetric capacity will allow a consistent approach to permitting this equipment and increase enforceability.
- Section (d)(13) is amended to eliminate the exemption for certain sand molding processes which may emit air contaminants such as volatile organic compounds or sulfur dioxide.
- Section (d)(17) is amended to eliminate the exemptions from permit requirements for all electric arc spray guns. This equipment is a source of particulate emissions and potential overspray (nuisance) problems and may be a source of toxic emissions. Such operations must be evaluated to determine potential adverse health impacts of the substances which may be emitted.

- Section (d)(18) is amended to add an exemption for arc welding equipment.
- Section (d)(19) is amended to add an exemption from permit requirement for soldering equipment and certain solder screen processes. Emissions from such equipment are considered minimal.
- Section (d)(22) is amended to clarify the exemption with the addition of the definition for dry batch. Clarification will result in consistent permitting of this equipment.
- Section (d)(35) is amended to eliminate the exemption for smoking meat, fish or poultry and roasting of coffee unless all the product is consumed on the premises. These processes have a potential for visible emissions and for emissions of particulate matter. There is a potential for public nuisance complaints associated with such processes.
- Section (d)(36) is amended to clarify the exception from exemption of certain copper strip etching processes.
- Section (d)(43) is amended to eliminate the exemption for sewage treatment flares. Sewage treatment plants are subject to permit requirements and the flares will be evaluated as part of the sewage treatment plant. Equipment at sewage treatment plants are a significant source of emissions and subject to review under the AB 2588 process.
- Section (d)(44) is amended to change the exemption for cold solvent degreasers by reducing the surface area from 5.0 square feet to 1.0 square feet.
- Section (d)(45) is amended to eliminate the exemption from permit requirements for ovens where organic solvents or materials containing organic solvents are charged. Small ovens remain exempt with the exception of ovens which may emit volatile organic compounds.
- Section (d)(46) is amended to change the permit exemption level for powder coatings to less than one pound per day. Operations of this level will have minimal emissions and reduced potential for public nuisance problems. Recording requirements have been clarified.
- Section (d)(48), the exemption for vapor degreasers has been deleted.
- Section (i)(7) is amended to add an exemption for peptide synthesis. This process has been determined to be a minimal source of volatile organic emissions.
- Section (p)(5) is amended to eliminate the exemption from permit requirements for equipment used for inspection of metal products which use a solution containing volatile organic solvents. This equipment is a source of volatile organic emissions and must be evaluated to determine emission levels.
- Section (p)(8) has been moved to Section (i) and has been changed to add restrictions on the cleaning of products which may contain residues of volatile organic compounds.
- Section (p)(24) is amended to add an exemption from permit requirements for field deployable military equipment used solely for field training, war, or emergency.

The language in the following sections is being amended to clarify the intent of each exemption. These amendments will eliminate ambiguity and increase enforceability.

- Section (a), floating dry docks have been added as an exception to the exemption.

WORKSHOP NOTICE - RULE 11

Page 3

- Section (d)(7) has been amended by adding printing and graphic arts presses. Recordkeeping requirements have been clarified.
- Section (d)(8), specific permit language has been added to the exemption for ovens.
- Section (d)(21), vacuum producing devices have been added to the exemption.
- Section (d)(27), manufacturer's rating has been added to the description of abrasive blast equipment.
- Section (h)(1), specific language for coating operations has been added to this section. Recordkeeping requirements have been clarified.
- Section (i)(3) has been amended to add plastic fabrication processes to the exemption.
- Section (n), language has been added to this section which defines the meaning of identical.

Copies of the proposed changes may be obtained by contacting Juanita Ogata at 694-3307.

If you have any questions concerning the proposed amendments, please contact Teresa Morris at (619) 694-3342 or me at (619) 694-3303.



RICHARD J. SMITH
Deputy Director

RJS:TM:jo
100490

Proposed amendments to Rule 11, Sections (a), (d), (f), (h), (i), (n)-(p), is to read as follows:

RULE 11. EXEMPTIONS FROM PERMIT REQUIREMENTS

(a) Any engines mounted on, within or incorporated into any vehicle, train, ship, boat or barge, that are used exclusively to provide propulsion, supply heat or electrical energy to that same vehicle, train, ship, boat, or barge, or that are used exclusively to load or unload cargo. Sand, rock, silt, soil or other materials which come from the bottom of a body of water shall not be considered cargo. This exemption is not intended to apply to equipment used for the dredging of waterways, to floating dry docks, or to equipment used in pile driving adjacent to or in waterways.

(d) The following equipment, provided the emissions of organic compounds, as defined in Rule 20.1, or particulate matter from the equipment do not exceed 100 pounds per day of either pollutant, or construction of the equipment was commenced before September 26, 1984.

(1) Internal combustion engines which fall into one of the following categories:

(i) Motor vehicle engines, except as provided in Section (a), pile drivers (except for Diesel pile driving hammers), and construction cranes that are routinely dismantled and transported to non-contiguous locations for temporary use;

(ii) Any combination of piston-type engines at one source, with a total maximum power output of less than 200 brake horsepower;

(iii) Piston-type engines of less than 50 brake horsepower.

(iv) Piston-type engines of greater than 500 brake horsepower which were installed before August 1, 1980;

(v) Any combination of piston-type engines at a stationary source, as defined in Rule 20.1, with a total maximum power output equal to or greater than 200 brake horsepower and less than 500 brake horsepower, for which construction commenced prior to (March 27, 1990);

(vi) Non-electrical generating piston type engines with a maximum power output of less than 500 brake horsepower when part of a process, process line, line, equipment, article, machine or other contrivance for which a Permit to Operate is required by these Rules and Regulations;

(vii) Any combination of piston-type engines for which construction commenced before April 5, 1983 provided all engines in the combination are less than 500 brake horsepower;

(viii) Gas turbines with a maximum heat input at ISO Standard Day Conditions of less than 5 million British Thermal Units per hour fired exclusively with natural gas and/or liquified petroleum gas;

(ix) Gas turbines with a maximum heat input of less than 10 million British Thermal Units per hour fired exclusively with natural gas and/or liquified petroleum gas for which construction commenced before (March 27, 1990); or

(x) Gas turbines with a maximum heat input of less than 50 million British Thermal Units per hour fired exclusively with natural gas and/or liquified petroleum gas installed before October 2, 1977.

(2) Water cooling towers and water cooling ponds not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.

(3) Portable aircraft engine test stands which were constructed before November 4, 1976.

(4) Fuel-burning equipment as described below:

(i) Fuel-burning equipment, except internal combustion engines, with a maximum gross heat input rate of less than one million British Thermal Units (0.252×10^6 Kcal) per hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a Permit to Operate is required by these Rules and Regulations.

(ii) Fuel burning equipment, except steam boilers and internal combustion engines, with a maximum gross heat input of less than 50 million British Thermal Units (12.6×10^6 Kcal) per hour, and fired exclusively with natural gas, liquified petroleum gas or a combination of natural gas and liquified petroleum gas.

(iii) Steam boilers with a maximum gross heat input of less than 50 million British Thermal Units (12.6×10^6 Kcal) per hour, if construction commenced prior to (March 27, 1990), and fired exclusively with natural gas, liquified petroleum gas or a combination of natural gas and liquified petroleum gas.

(iv) Any combination of steam boiler equipment at one stationary source, as defined in Rule 20.1, with a total maximum gross heat input rate of less than 20 million British Thermal Units (7.6×10^6 Kcal) per hour, if construction commenced on or after (March 27, 1990) and fired exclusively with natural gas, liquified petroleum gas or a combination of natural gas and liquified petroleum gas.

(5) Extrusion equipment used exclusively for metals, minerals, or plastics: except coking extrusion equipment or processes which manufacture products containing greater than one percent asbestos fiber by weight.

(6) Equipment used exclusively for forging, pressing, rolling or drawing of metals or for heating metals immediately prior to forging, pressing, rolling or drawing.

(7) All printing or graphic arts presses located at a stationary source, as defined in Rule 20.1, which emits a total of less than 19.9 lbs (9 kg) of volatile organic compounds, subject to Rule 67.16, on each day of operation. It is the responsibility of any person claiming this exemption to maintain all usage records, including any mixing ratios, necessary to establish maximum daily emissions and to make this information available to the Air Pollution Control Officer upon request.

~~(8)~~ Ovens used exclusively for the curing, softening or annealing of plastics. This does not apply to ovens used to cure fiberglass reinforced plastics.

~~(9)~~(8) Ovens, if only part of a processes which requires a permit pursuant to Rule 10 or which is are exempt from a requirement for a Permit to Operate pursuant to this rule.

~~(10)~~(9) Crucible-type or pot-type furnaces with a brimful capacity of less than 450 cubic inches of any molten metal.

~~(11)~~(10) Crucible furnaces, pot furnaces or induction furnaces, with a capacity of ~~992 pounds (450 kilograms)~~ 2500 cubic inches or less each, in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, or poured or non-ferrous metals are held in a molten state.

~~(12)~~(11) Shell core and shell-mold manufacturing machines.

~~(13)~~(12) Molds used for the casting of metals.

~~(14)~~(13) Foundry sand mold forming equipment is exempt except those to which heat, sulfur dioxide or organic material is ~~not~~ applied.

~~(15)~~(14) Shot peening cabinets where only steel shot is employed and no scale, rust, or old paint is being removed.

~~(16)~~(15) Die casting machines.

~~(17)~~(16) Tumblers used for the cleaning or deburring of metal products without abrasive blasting.

~~(18)~~(17) Metalizing guns, except ~~plasma~~ electric arc spray guns, where the metal being sprayed is in wire form.

~~(19)~~(18) Brazing, welding equipment including arc welding equipment.

~~(20)~~(21) Hand soldering equipment and solder-screen processes. Solder-screen means those processes which use a process similar to silk-screening to apply solder and which subsequently undergo a reflow process other than a vapor phase solder reflow process. Soldering equipment except automated process lines.

~~(21)~~(20) Equipment used exclusively for the sintering of glass or metals.

~~(22)~~(21) Atmosphere generators and vacuum producing devices used in connection with metal heat treating processes.

~~(23)~~(22) Dry batch mixers of 0.5 cubic yards (0.38 cubic meters) rated working capacity or less. Dry batch means material is added in a dry form prior to the introduction of a subsequent liquid fraction or when no liquid fraction is added.

~~(24)~~(23) Batch mixers (wet) of 1 cubic yard (0.765 cubic meter) capacity or less where no organic solvents, diluents or thinners are used.

~~(25)~~(24) Equipment used exclusively for the packaging of lubricants or greases.

~~(26)~~(25) Portable conveyors (belt or screw type) where there is no screening.

~~(27)~~(26) Roofing kettles (used to heat asphalt) with a capacity of 85 gallons (322 liters) or less.

~~(28)~~(27) Abrasive blasting equipment used with a manufacturer's-rated sand capacity of less than 100 pounds (45.4 kg) or 1 cubic foot or less.

~~(29)~~(28) Abrasive blast cabinets which vent through control devices and into the buildings in which such cabinets are located.

~~(30)~~(29) Blast cleaning equipment using a suspension of abrasive in water.

~~(31)~~(30) Equipment used for buffing (except automatic or semi-automatic tire buffers) or polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of ceramic artwork, ceramic precision parts, leather, metals, rubber, fiber board, masonry, ~~non-friable asbestos, carbon or graphite~~, plastics except when reinforced with fiberglass asbestos or carbon fibers. Equipment used for shearing of any material is exempt.

~~(32)~~(31) Equipment used for carving, cutting, drilling, surface grinding, planing, routing, sanding, sawing, shredding or turning of wood, or the pressing or storing of sawdust, wood chips or wood shavings.

~~(33)~~(32) Paper shredders and paper disintegrators which have a capacity of 600 pounds per hour or less.

~~(34)~~(33) Equipment used to liquefy or separate oxygen, nitrogen or the rare gases from the air.

~~(35)~~(34) Equipment used exclusively to grind, blend or package tea, cocoa, spices or roasted coffee.

~~(36)~~(35) Equipment, other than boilers, used for preparing food for human consumption and located at eating establishments, bakeries and confectioneries. This exemption does not apply to equipment used for smoking of fish, meat, poultry or roasting coffee unless all of the product smoked or roasted is consumed on the premises at which it is smoked or roasted.

~~(37)~~(36) Equipment using exclusively aqueous solutions not containing volatile organic compounds, as defined in Rule 20.1, in excess of 10 percent by weight for surface preparation, cleaning, anodizing, plating, polishing, stripping or etching ~~(does not include except acid chemical milling, copper strip etching, chrome plating, chromic acid anodizing or the stripping of chromium, or copper etching using ammonium hydroxide, ammonium chloride or concentrated solutions of nitric, hydrofluoric and/or hydrochloric acids.); or~~ equipment using aqueous solutions for electrolytic deposition of inorganic films.

~~(38)~~(37) Laboratory equipment used exclusively for chemical or physical analyses and bench scale laboratory equipment provided such bench scale equipment is not used for production purposes to directly produce a deliverable product or service, other than the first-article product or service, and provided the emissions of organic compounds, as defined in Rule 20.1, from such bench scale equipment, do not exceed five (5) pounds per day and provided such bench scale equipment does not emit detectable levels of compounds listed as Acutely Hazardous by Section 25532 of the California Health and Safety Code.

For the purposes of this subsection, the following definitions shall apply:

"Bench Scale Laboratory Equipment" shall mean equipment which a) is under direct, immediate and exclusive control of a laboratory director; b) is sub-scale in size; and c) is used for the sole purpose of conducting studies or tests to develop a new or improved product or service.

"First-Article Deliverable Product or Service" shall mean the first product or service which is produced using bench scale laboratory equipment and which is delivered to a potential intra-company or external customer for approval. First article deliverable product or service shall not exceed one (1) unit of product or service per customer.

~~(39)~~(38) Titanium chemical milling at temperatures below 110° F (43° C).

~~(40)~~(39) Orchard or citrus grove heaters.

~~(41)~~(40) Non-immersion dry cleaning equipment.

~~(42)~~(41) Alkaline chemical milling equipment for which construction or installation commenced prior to (March 27, 1990), or alkaline chemical milling equipment used exclusively for the cleaning of internal combustion engine parts.

~~(43)~~ Sewage treatment flares.

~~(44)~~(42) Laundry dryers, extractors or tumblers used for fabrics cleaned only with solutions of bleach or detergents containing no organic solvents.

~~(45)~~ Ovens having an internal volume of 27 cubic feet (0.765 cubic meter) or less in which organic solvents or materials containing organic solvents are charged.

~~(46)~~(43) Equipment used for compression molding and injection molding of plastics.

~~(47)~~(44) Cold solvent cleaning and paint stripping tanks with a liquid surface area of 5 1.0 square foot (~~0.47~~ 0.09 square meter) or less used for the employment or application of organic solvents or materials containing organic solvents.

~~(48)~~ Vapor degreasers with a vapor/air interface area of 5 square feet (~~0.47~~ square meter) or less.

~~(49)~~(45) Railway sweepers used for cleaning rail tracks.

(46) Equipment used for powder coating operations, except metalizing gun operations, where emissions of volatile organic compounds are less than one pound per day. The person claiming this exemption must keep daily usage records, and all data necessary to establish maximum daily emission level. This information must be made available immediately upon request.

(f) Mobile transport tanks or delivery tanks or cargo tanks on vehicles used for the delivery of volatile organic compounds, except asphalt tankers used to transport and transfer hot asphalt used for roofing applications.

(h) Liquid surface coating application operations:

(1) Conducted within an application station located ~~Located~~ at a stationary source, as defined in Rule 20.1, where not more than 20 gallons per year of material containing organic compounds, as defined in Rule 20.1, are ~~apply~~ applied. ~~(It is the responsibility of any person claiming this exemption to maintain purchase and daily usage records, including any mixing ratios, necessary to substantiate the claim. Coatings applied by means of non-refillable aerosol cans shall not be included in the annual usage determination for purposes of determining the 20 gallon per year limit stated above.);~~

(2) Using non-refillable aerosol spray cans for application of coatings;

(3) Conducted outside defined coating areas for the purpose of touch-up or maintenance of equipment;

(4) Using hand-held brushes for application of a primer coating from containers of eight (8) ounces (236.6 milliliters) or less in size to fasteners to be installed on aerospace component parts;

(5) Using air brushes with a coating capacity of two (2) ounces (59.1 milliliters) or less for the application of a stencil coating; or

(6) Conducted in primary or secondary schools for instruction.

(i) The following uncontrolled equipment or processes using materials containing volatile organic compounds, as defined in Rule 20.1, when the emissions of volatile organic compounds, as defined in Rule 20.1, from the equipment or process do not exceed five pounds in any one day:

- (1) Foam manufacturing or application;
 - (2) Fiberglass reinforced plastic fabrication using resins such as epoxy and polyester;
 - (3) Plastics manufacturing or fabrication;
 - (4) Ink mixing tanks;
 - (5) Cold solvent degreasers used exclusively for educational purpose; ~~and~~
 - (6) Batch-type waste-solvent recovery stills with batch capacity of 5 gallons or less for onsite recovery of waste solvent, provided the still is equipped with a device which shuts off the heating system if the solvent vapor condenser is not operating properly; and
 - (7) Peptide Synthesis.
- ~~(p)(9)(8)~~ Equipment used for washing or drying ~~products~~ articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of volatile organic compounds.

~~It is the responsibility of any person claiming this exemption to maintain records which substantiate this claim.~~ It is the responsibility of any person claiming this exemption to maintain purchase and daily usage records including mixing ratios necessary to substantiate the claim. This information must be made available immediately upon request. This exemption shall not apply to equipment required to obtain a permit for emissions of air contaminants other than volatile organic compounds as defined in Rule 20.1.

(n) Identical replacements in whole or part of any article, machine, equipment or other contrivance where a Permit to Operate had previously been granted for such equipment under Rule 10. Identical means the same manufacturer, model number, and type.

(p) The following equipment:

- (1) Equipment used for hydraulic or hydrostatic testing.
- (2) Equipment used exclusively for the dyeing or stripping (bleaching) of textiles where no organic solvents, diluents or thinners are used.

(3) Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in a paste form and no organic solvents, diluents or thinners are used.

(4) Equipment used exclusively for the melting or applying of wax where no organic solvents, diluents or thinners are used.

(5) Equipment used for inspection of metal products except metal inspection equipment utilizing a suspension of magnetic or fluorescent dye particles in volatile organic solvent or in a liquid which contains more than ten percent volatile organic solvent.

(6) Equipment used exclusively for the manufacture of water emulsions of asphalt, greases, oils or waxes.

(7) Equipment used exclusively for conveying and storing plastic pellets.

(8) Equipment used exclusively for the mixing and blending of materials at ambient temperature to make water-based adhesives.

~~(10)~~(9) Curing or baking ovens in which no organic solvents or materials containing organic solvents are charged.

~~(11)~~(10) Mixers for rubber or plastics where no material in powder form is added and no organic solvents, diluents or thinners are used.

~~(12)~~(11) Each process line at a stationary source, as defined in Rule 20.1, for coating of pharmaceutical tablets provided maximum emissions of volatile organic compounds (defined in Rule 67.15), are below ~~15.4~~ 15.0 pounds on each day for all operations subject to Rule 67.15. It will be the responsibility of any person claiming this exemption to maintain all records necessary to establish maximum daily emissions and to make this information available to the District upon request.

~~(13)~~(12) Roll mills or calendars for rubber or plastics and no organic solvents, diluents or thinners are used.

~~(14)~~(13) Vacuum-producing devices used in laboratory operations or in connection with other equipment which is exempt by Rule 11.

~~(15)~~(14) Natural draft hoods, natural draft stacks or natural draft ventilators.

~~(16)~~(15) Natural gas-fired or liquefied petroleum gas-fired or electrically heated furnaces for heat treating glass or metals, the use of which does not involve molten materials.

~~(17)~~(16) Comfort air conditioning or comfort ventilating systems which are not designed to remove air contaminants generated by or released from specific units or equipment.

~~(18)~~(17) Refrigeration units except those used as, or in conjunction with, air pollution control equipment.

~~(19)~~(18) Equipment used exclusively for space heating, other than boilers.

- ~~(20)~~(19) Equipment used exclusively for bonding lining to brake shoes.
- ~~(21)~~(20) Lint traps used exclusively in conjunction with dry cleaning tumblers.
- ~~(22)~~(21) Equipment used exclusively to compress or hold dry natural gas.
- ~~(23)~~(22) Kilns used for firing ceramic ware, heated exclusively by natural gas, liquefied petroleum gas, electricity or any combination thereof.

(23) Field deployable equipment assigned to specific military units which is used solely during field training, war, or emergency declared by appropriate authority, which would otherwise require a Permit to Operate pursuant to Rule 10. This exemption does not apply if this equipment is used in any manner associated with permanent, stationary structures, facilities, installations or equipment.