



Air Pollution Control Board
Brian P. Bilbray District 1
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John MacDonald District 5

Air Pollution Control Officer
R. J. Sommerville

NOTICE OF WORKSHOP

**FOR DISCUSSION OF PROPOSED AMENDMENTS TO
RULE 67.19 - COATING AND PRINTING INK
MANUFACTURING OPERATIONS
RULE 67.22-EXPANDABLE POLYSTYRENE FOAM PRODUCT
MANUFACTURING OPERATIONS
RULE 67.24 - BAKERY OVENS**

The San Diego County Air Pollution Control District will hold a public meeting to consider proposed amendments to Rule 67.19 - Coatings and Printing Inks Manufacturing Operations, Rule 67.22 - Expandable Polystyrene Foam Product Manufacturing Operations, and Rule 67.24 - Bakery Ovens. Comments concerning these proposals may be submitted in writing before, or made at, the workshop which is scheduled as follows:

DATE: Thursday, December 15, 1994
TIME: 9:00-11:00 a.m.
PLACE: Air Pollution Control District
Conference Room #139
9150 Chesapeake Drive
San Diego CA

The Federal Clean Air Act (FCAA) requires all regions in the United States which do not meet the National Ambient Air Quality Standard for ozone to adopt rules regulating emission of ozone precursors, i.e. volatile organic compounds (VOCs) and nitrogen oxides (NO_x). Until recently, San Diego County was classified by the Environmental Protection Agency (EPA) as a severe ozone non-attainment area. Consequently, the District was required by the FCAA to adopt rules reflecting Reasonably Available Control Technology (RACT) for all major sources (those emitting 25 tons per year of VOCs or more) of VOC emissions. However, based on information submitted by the District, EPA reclassified the District from a severe to a serious ozone non-attainment area on October 14, 1994. This reclassification will increase the major source emission threshold from 25 to 50 tons per year.

Currently, Rules 67.19, 67.22, and 67.24 require facilities emitting more than 25 tons per year of VOCs to install add-on control equipment or provide process modifications reflecting federal RACT requirements. In addition, Rule 67.24 requires that facilities perform emissions testing if their estimated emissions exceed 80% of the major source emission threshold.

The proposed amendments will raise the applicability threshold for the RACT level control requirements in Rules 67.19, 67.22 and 67.24 from 25 to 50 tons of VOC emissions per year and will remove the emissions testing requirement from Rule 67.24.

If you would like a copy of the proposed amendments to Rule 67.19, 67.22 or 67.24, please call Juanita Ogata at (619) 695-8851. 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
Deputy Director

RJSm:SM:jo
11/9/94

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

PROPOSED AMENDMENTS TO RULES 67.19, 67.22 AND 27.24

1. Proposed amendment to Rule 67.19, Section (b) is to read as follows:

RULE 67.19. COATING AND PRINTING INK MANUFACTURING OPERATIONS

(b) EXEMPTIONS

(1) The provisions of this rule shall not apply to any stationary source where emissions of volatile organic compounds (VOC's) from all coating and/or printing ink manufacturing operations are less than an average of 15.0 pounds (6.8 kg) per day of operation for each calendar month, provided the owner or operator of the stationary source maintains monthly usage and production records of VOC containing materials necessary to establish average daily VOC emission levels. The average daily emission levels shall be determined by taking into account the number of operational days per given month. The monthly records of VOC containing materials shall be retained on site for at least three years and made available to the District upon request.

(2) The requirements of Subsection (d)(2) of this rule shall not apply to a stationary source where the combined uncontrolled emissions of VOC's from all coating and/or ink manufacturing operations, including emissions from equipment cleaning, are less than ~~25~~ 50 tons in each calendar year.

(3) The requirements of Subsection (d)(3) of this rule shall not apply to any stationary storage tank with a capacity of less than 550 gallons (2080 liters) or to any stationary storage tank used exclusively for storage of epoxy resins, water-based coatings or inks, or paste inks.

(4) The requirements of Subsections (d)(1) and (d)(2) of this rule shall not apply to mixing vats that are used exclusively for mixing water-based coatings or inks.

2. Proposed amendment to Rule 67.22, Section (b) is to read as follows:

**RULE 67.22. EXPANDABLE POLYSTYRENE FOAM PRODUCT
MANUFACTURING OPERATIONS**

(b) EXEMPTIONS

The requirements of Section (d) of this rule shall not apply to any stationary source with uncontrolled VOC emissions of less than ~~25~~ 50 tons per calendar year from EPS foam products manufacturing operations.

3. Proposed amendments to Rule 67.24, Section (b), (f) and (g) are to read as follows:

RULE 67.24. BAKERY OVENS

(b) EXEMPTIONS

(1) The provisions of this rule shall not apply to bakery ovens which are located at a stationary source where the combined rated heat input capacity of all bakery ovens is less than two million British Thermal Units (BTU) per hour.

It shall be the responsibility of any person claiming the exemption in Subsection (b)(1) to provide information necessary for the District to determine the combined rated heat input capacity of all bakery ovens. Such information may include oven or burner manufacturer specifications, or may include fuel or energy consumption rates for oven start-up period(s) in cases where manufacturer specifications are unavailable.

(2) The provisions of this rule shall not apply to ovens used exclusively for the baking of products leavened chemically without yeast.

(3) The provisions of Sections (d) and (g) of this rule shall not apply to bakery ovens which are located at a stationary source where the uncontrolled emissions of VOC's from all bakery ovens combined is less than ~~25~~ 50 tons per calendar year.

(f) TEST METHODS

(1) For the purposes of determining the total annual uncontrolled VOC emissions from a stationary source, VOC emission factors for each yeast-leavened bakery product shall be determined in accordance with both Table 67.24 and the following formula:

$$EF = 0.95 Y_i + 0.19 t_i - 0.51S - 0.86 t_s + 1.90$$

where Y_i = initial yeast percentage
 t_i = total fermentation time
 S = second (spiking) yeast percentage, if applicable
 t_s = fermentation time for second yeast percentage, if applicable, and
 EF = emission factor, pounds of VOC emissions per ton of baked product

Annual uncontrolled emission rates shall be calculated by multiplying emission factors and the annual production rate for each yeast-leavened finished bakery product. The highest of the two calculated emission rates for a stationary source shall be used for the purposes of this rule. ~~In cases where annual emissions for a stationary source, as determined using the highest emission rate, exceed 80 percent of the annual emissions specified in Subsection (b)(3), or other cases a~~ As deemed appropriate by the Air Pollution Control Officer, emission factors shall instead be determined in accordance with Subsection (f)(2).

~~Instead of using calculated emission factors, an owner or operator may elect to use VOC emission factors determined according to Subsection (f)(2).~~

(2) VOC emission factors for yeast-leavened bakery products may be determined by EPA Methods 18, 25, and/or 25A (40 CFR 60) as they exist on June 7, 1994, together with exhaust flow rates and oven throughputs. Test procedures shall be performed in accordance with a protocol approved by the Air Pollution Control Officer. An alternative test method may be used provided such method has been approved, in advance, by the Air Pollution Control Officer, ARB, and EPA.

(3) Measurement of emission control device reduction efficiency subject to Subsection (d)(2)(iii) of this rule shall be conducted in accordance with EPA Methods 18, 25, and/or 25A (40 CFR 60) as they exist on June 7, 1994. Test procedures shall be performed in accordance with a protocol approved by the Air Pollution Control Officer.

(g) COMPLIANCE SCHEDULE

A person operating a bakery oven(s) subject to Subsection (d)(2) of this rule shall meet the following increments of progress:

(1) For an oven which commenced operation prior to June 7, 1994, or for a replacement of such an oven:

(i) By December 7, 1994, submit to the Air Pollution Control Officer any necessary application for Authority to Construct and Permit to Operate an air pollution control system meeting the requirements of Subsection (d)(2);

(ii) By June 7, 1995, install an air pollution control system pursuant to Subsection (d)(2).

(2) For an oven which commences operation on or after June 7, 1994, be in compliance with Subsection (d)(1) by the date of commencement of oven operation.

~~(3) For an existing stationary source having a calculated annual emission rate pursuant to Subsection (f)(1) exceeding 80 percent of the emission rate specified in Subsection (b)(3), by August 7, 1994, submit to the Air Pollution Control Officer for approval a plan for emissions testing pursuant to Subsection (f)(2). Such plan shall provide for emissions testing to be completed, and test report(s) submitted, by December 7, 1994.~~

~~Stationary sources electing to comply with Subsections (d)(2) and (g)(1) shall not be subject to Subsection (g)(3).~~