



Air Pollution Control Board
Greg Cox District 1
Dianne Jacob District 2
Pam Slater District 3
Ron Roberts District 4
Bill Horn District 5

Air Pollution Control Officer
R. J. Sommerville

COMPLIANCE ADVISORY

Notice of Amendments to Rule 2 (Definitions) and Related Rules 19.3, 20.1, 67.0-67.5, 67.7, 67.11, 67.12, 67.15-67.19, 67.22 and 67.24.

On May 15, 1996, the Air Pollution Control Board amended District Rule 2 (Definitions), which defines various terms used throughout the District Rules and Regulations. The amendments added definitions for Volatile Organic Compounds (VOC) and Exempt Compounds to be consistent with recent revisions of state and federal regulations. District Rules 19.3, 20.1, 67.0-67.5, 67.7, 67.11, 67.12, 67.15-67.19, 67.22 and 67.24 were amended concurrently to delete rule specific definitions of VOC and Exempt Compounds and instead reference the new Rule 2 definitions.

The Rule 2 revisions are summarized below.

Applicability The definitions provided in Rule 2 apply to all Rules and Regulations of the Air Pollution Control District, unless the same term is defined differently in another rule. In such case, the definition in the specific rule takes precedence over the Rule 2 definition and applies for that rule.

Definitions The amendments add new or revised definitions for various terms used in District Rules, and delete outdated definitions.

The definition of Exempt Compounds was expanded to include ethane, specific volatile methylated siloxanes (VMS), parachlorobenzotrifluoride (PCBTF), acetone and perchloroethylene. These compounds are still regulated under Rule 66 - Organic Solvents, Rule 67.6 - Solvent Cleaning Operations and Rule 67.8 - Dry Cleaning Facilities Using Halogenated Organic Solvent.

Implications of Rule 2 Amendments:

The most significant changes as a result of these amendments are that some new compounds (VMS and PCBTF) are available that will not be regulated as VOC by the District, ARB or EPA; and that some existing compounds (acetone, ethane and perchloroethylene) will no longer be regulated as VOCs. These compounds can now be used, where appropriate, to substitute for regulated VOC compounds to reduce VOC emissions. However, there are some significant cautions:

- Acetone is a very volatile and highly flammable solvent. Acetone usage may require changes to process equipment, ventilation systems, employee training, fire safety and regulatory programs, storage devices and other activities because of these characteristics.
- Perchloroethylene is a human carcinogen. It has been identified by the federal EPA as a hazardous air pollutant, by the California ARB as a toxic air contaminant and is so regulated

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by the District. A facility that proposes to substitute current VOCs with perchloroethylene, or increase usage of perchloroethylene, will be evaluated by the District to ensure that it will not pose a significant public health risk.

- Based on current information, the District does not anticipate regulating ethane, acetone, PCBTF or VMS as toxic air contaminants or hazardous air pollutants in the foreseeable future. Although unlikely, should EPA or ARB designate any of these compounds as toxic or hazardous in the future, or promulgate regulations requiring their control, the District may require that emissions or usage of these compounds be reduced.

Facilities may use acetone, ethane, perchloroethylene, PCBTF or VMS in their processes or materials. Unless otherwise specified in facility permits, emissions or usage of these compounds should not be included when recording or reporting VOC emissions, VOC content of materials or VOC solvent usage.

If your current District permits do not have specific usage or emission limits for acetone, ethane, PCBTF or VMS, these materials may be used without the need for changes to your permits. If your permits contain specific usage or emission limits for any of these compounds and you wish to exceed or remove these limits, please send a written request to the District. Please direct the request to "Senior Engineer, Chemical Section". Your request will need to be accompanied by a \$75.00 processing fee. The request should specify what materials you intend to use and estimated maximum annual and daily usage.

Such permit changes will be usually handled in response to a written request. In a few cases, the request may involve more complex permitting issues and the District may require that an application to modify permits be filed with additional fees paid to cover District costs of evaluating and processing the permit changes.

If you are considering replacing your current materials with materials or solvents containing perchloroethylene, or increasing your usage of perchloroethylene above current levels (or permitted levels as specified in your District permits), you will need to submit an application to modify your permit(s). The District will evaluate your application for compliance with District rules and potential impacts to public health. Contact the District's Chemical Section (Ron McInnes, (619) 694-3965) to discuss application and processing fee requirements.

Copies of the new Rule 2 can be obtained by calling (619) 694-3307. For more information, please call the District's Compliance Division at (619) 694-3340.

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COMPLIANCE ADVISORY

Notice of Revision to Standard Permit Language Notice of Revision to Permit Format

The District is revising some of the standard language on your Permit(s) to Operate to include a list of applicable rules. This change is being made to inform the permit holder that specific District rules may apply to your operation or equipment. A list of the general rules which apply to all permits has already been added. Rules 2-Definitions, 10-Permits Required, 40-Permit Fees, 50-Visible Emissions, 51-Nuisance and 67.17-Storage of Materials Containing Volatile Organic Compounds have been added between the equipment description and permit conditions. Additionally, a new statement has been inserted between the equipment description and permit conditions to remind the permit holder they must comply with the listed permit conditions and all applicable District rules.

In the next year the list of general rules will continue to be updated in order to include the rules that apply specifically to each permit unit. In addition, the look of the permit has been improved to increase readability.

For more information regarding the new wording, please contact Jerry Carrier, Compliance Division at (619) 495-5342. If you have comments regarding the new look of the permit, please contact Pat Hackley at (619) 694-2444.

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