AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

Air Pollution Control Board

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

DATE: April 9, 2003

TO: San Diego County Air Pollution Control Board

SUBJECT: AMENDMENT OF RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS (District: All)

SUMMARY:

Overview

Rule 67.3 regulates volatile organic compound emissions from surface coating of metal parts and products and related processes. It was initially adopted on May 9, 1979 (APCB #1).

Rule 67.3 is being amended in response to a small business request to provide an exemption for low-usage coatings applied to specialty custom-made signs and sign-related objects that cannot meet the volatile organic compound content limits of the rule. The amendment will allow a company to use up to 20 gallons per year of higher volatile organic compound content coatings provided that their volatile organic compound content does not exceed 780 grams per liter. Affected businesses agreed this limited exemption will meet their needs. In addition, the rule is being amended to clarify certain definitions and to address an issue raised in the recent Air Resources Board program evaluation.

There are ten companies in San Diego County that manufacture specialty signs. The maximum additional volatile organic compounds emissions allowed by the proposed amendment would be 740 pounds per year, or less than one tenth of one percent of the 410 tons per year from all 262 companies subject to Rule 67.3. This increase is considered insignificant.

Pursuant to the California Environmental Quality Act, an Initial Study was prepared evaluating potential environmental consequences resulting from the proposed amendments. No significant adverse environmental effects were identified. Accordingly, a Negative Declaration has been prepared. The California Environmental Quality Act requires the Board to certify that the Negative Declaration reflects the Board's independent judgment of potential environmental consequences resulting from the amendments. The Resolution making these findings and adopting the Negative Declaration is attached.

A public workshop for amended Rule 67.3 was held on December 5, 2002, and was

attended by five people. Written comments were also received. The comments and District responses are presented in the attached workshop report.

Recommendation(s)
AIR POLLUTION CONTROL OFFICER

1. Consider the Initial Study and proposed Negative Declaration and adopt the Resolution adopting the Negative Declaration, making appropriate findings that: (a) the Initial Study and Negative Declaration reflect the Board's independent judgment and analysis; (b) considering the entire record before the Board, there is no substantial evidence that the proposed amended rule may have a significant adverse environmental effect; (c) the Negative Declaration is adopted as a true and complete statement of potential environmental consequences resulting from proposed amendment to Rule 67.3; and (d) there is no evidence in the entire record that proposed amendment to Rule 67.3 will have an adverse effect on wildlife resources and, on the basis of substantial evidence, the presumption of adverse effect in California Code of Regulations, Title 14, Section 753.5(d) has been rebutted.

2. After adopting the Negative Declaration, adopt the resolution amending Rule 67.3 and make appropriate findings:

   (i) of necessity, authority, clarity, consistency, non-duplication, and reference as required by Section 40727 of the State Health and Safety Code;

   (ii) that amending Rule 67.3 will alleviate a problem and will not interfere with the attainment of ambient air quality standards (Section 40001 of the State Health and Safety Code);

   (iii) that analysis of the socioeconomic impact of amending Rule 67.3 is not required by Section 40728.5 of the State Health and Safety Code because amending Rule 67.3 provides a less restrictive emission limit that does not result in any significant increase of emissions; and

   (iv) that an analysis of existing requirements applicable to the sources affected by the proposed rule has been prepared pursuant to Health and Safety Code Section 40727.2.

3. Approve the Certificate of Fee Exemption for De Minimis Impact Finding exempting the District from payment of fees to the California Department of Fish and Game.

Fiscal Impact
The recommended action will have no fiscal impact on the District.

Business Impact Statement

SUBJECT: AMENDMENT OF RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS (District: All)

Amended Rule 67.3 will have a positive impact on business because it provides an exemption for companies using small amounts of non-compliant coatings for painting custom-made signs and related objects.

Advisory Board Statement
There was no quorum at the Air Pollution Control Advisory Committee meeting. The two members present recommended amending Rule 67.3 at its March 12, 2003, meeting.

BACKGROUND:
Metal parts and products coating operations are a source of volatile organic compound (VOC) emissions. VOCs are emitted during the application and drying/curing of coatings, from surface preparation materials, and from cleaning of coating equipment. VOCs react in the atmosphere to form ozone, the primary constituent of smog. While the District meets the federal one-hour ozone ambient air quality standard, it does not yet meet the more stringent federal eight-hour standard or more stringent state ozone standard.

Rule 67.3 controls VOC emissions from metal parts and products coating operations and related processes. It limits the VOC content of paints and cleaning solvents, specifies methods to minimize VOC emissions during equipment cleaning operations, and requires the use of high-transfer efficiency application equipment. The rule exempts specified coatings and small coating operations. Additionally, it allows higher VOC content limits for pretreatment wash primers and high-performance architectural coatings.

Rule 67.3 was initially adopted in 1979 and subsequently amended in 1990, 1994, and 1996. The rule reflects Federal Reasonably Available Control Technology (RACT) and state Best Available Retrofit Control Technology requirements. It is presently approved by the Environmental Protection Agency (EPA) and included in the State Implementation Plan. Consequently, any revisions to Rule 67.3 must be submitted to the Air Resources Board (ARB) and EPA for approval.

For some time, a small business in San Diego County has been unable to find Rule 67.3 compliant paints for custom-made signs and other related objects made for outdoor exposure. These products can consist of combinations of metals with other materials such as plastics, wood, or glass where the coating of all substrates is required to match exactly in appearance and performance. The Air Pollution Control District Hearing Board granted this business a variance from Rule 67.3 to continue using a small volume of non-compliant coatings. At the same time, the company was actively seeking a manufacturer who could supply compliant low-VOC content coatings with the required characteristics. However, this effort has been unsuccessful and the business has received several variances.

In 2000, ARB conducted an evaluation of the District's program. The ARB noted that the company had operated under variance for eight years and recommended that the District amend Rule 67.3 provided that the company could demonstrate to the District that compliant coatings were not available for their specific needs.

During the past year, the District has worked with this company to investigate the feasibility of obtaining compliant paints that would provide satisfactory performance. The District has concluded that such low VOC paints are not available at this time.

The proposed amendments to Rule 67.3 provide a limited exemption for this category of coating use. Specifically, coatings applied to metal surfaces of specialty custom-made signs or sign-related objects, including those fabricated from metals or from the combination of metals with other substrates, where all coated substrates must match exactly in appearance and performance would be exempt from the current VOC content limits of Rule 67.3. A facility would be allowed to use up to 20 gallons per year of such coatings in any consecutive 12–month period provided the VOC content does not exceed 780 grams per liter, as applied, less water and less exempt compounds, and the company keeps records of coating usage and VOC content. The current VOC content limit for such coatings is 340 grams per liter. The amendments also clarify certain definitions.

In addition to the company that requested the proposed exemption, there are nine other companies that manufacture specialty signs. Assuming, as a worst-case, that all these companies would use the allowed 20 gallons of coatings per year, the maximum annual VOC emissions increase as a result of the proposed exemption would be 740 pounds. However, no other company has indicated any problems in using compliant coatings.

The Federal Clean Air Act prohibits revision of federally-approved RACT rules that may result in additional emissions. However, EPA policy allows deviation from this requirement upon a demonstration that the revision results in a "non-substantive difference" - defined as 5% of total emissions allowable under the rule. Recently, EPA issued further policy indicating that the additional emissions could be considered insignificant if they represent less than one percent of the emissions specified in the latest emission inventory of sources subject to the rule.

There are 262 companies in San Diego County subject to Rule 67.3 with combined VOC emissions of approximately 410 tons per year. This includes 100 tons per year of VOC emissions from the largest 60 sources reported in the latest District emission inventory. The maximum annual VOC emission increase as a result of the proposed Rule 67.3 amendments is 0.37 % of the inventoried emissions, and less than 0.1% of the total emissions from companies subject to Rule 67.3. Because the increase of emissions from amending Rule 67.3 is well below the EPA one percent threshold it is considered insignificant and approvable by EPA.

Socioeconomic Impact Assessment

Section 40728.5 of the State Health and Safety Code requires the District to perform a socioeconomic impact assessment for new and revised rules and regulations significantly affecting air quality or emission limitations. However, this requirement does not apply to any rule amendment that contains a less restrictive emission limit provided it does not interfere with the District's adopted plan, or does not result in any significant increase of emissions. The proposed amendment to Rule 67.3 will add a limited new exemption and could increase VOC

emissions in San Diego County by a maximum 740 pounds per year, which is insignificant and which will not interfere with the District's adopted plan. Therefore, a socioeconomic impact assessment is not required.

Compliance with Board Policy on Adopting New Rules

On February 2, 1993 (APCB #2), the Board directed that, with the exception of a regulation requested by business or a regulation for which a socioeconomic impact assessment is not required, no new or revised regulation shall be implemented unless specifically required by federal or state law. The proposed amendment of Rule 67.3 is requested by a small business and, therefore, is consistent with this Board directive.

California Environmental Quality Act

The District prepared an Initial Study pursuant to the California Environmental Quality Act (CEQA) to determine whether there is evidence that the proposed amendments to Rule 67.3 may have a significant environmental impact. The Initial Study revealed no substantial evidence that the proposed amendments may have a significant environmental impact.

Based on the Initial Study findings, a proposed Negative Declaration was prepared. The District published a Notice of Intent to adopt the proposed Negative Declaration and solicited comments during a 30-day review period. No public comments were received.

CEQA requires the Board to review the Initial Study, Negative Declaration, and any comments received. The Board must certify that the Negative Declaration reflects the Board's independent judgment of potential environmental consequences resulting from the proposed Rule 67.3 amendments.

Additionally, the District prepared a Certificate of Fee Exemption for a De Minimis Impact Finding pursuant to California Code of Regulations, Title 14, Section 753.5(c). The District will be exempt from payment of fees to the California Department of Fish and Game for reviewing the Negative Declaration if the Board finds, after considering the Initial Study and the record as a whole, there is no evidence that the proposed Rule 67.3 amendments will have a potential for an adverse effect on wildlife resources or the habitat on which wildlife depends, and the Board finds, on the basis of substantial evidence, that the presumption of adverse effect in California Code of Regulations, Title 14, Section 753.5(d) has been rebutted.

Comparison to Existing 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 part of the consistency finding to ensure proposed rule requirements do not conflict with or contradict other District or federal regulations, Health and Safety Code Section 40727.2 requires the District to perform a written analysis identifying and comparing the air pollution control standards and other provisions of proposed amended Rule 67.3 with existing or

proposed District rules and guidelines and existing federal rules, requirements, and guidelines applying to the same source category.

The requirements of amended Rule 67.3 have been compared to the federal RACT requirements and the District's New Source Review rules for metal parts and products coating operations. The analysis is presented in Attachment E. It demonstrates that there are no conflicts or contradictions between amended Rule 67.3 and other federal or District requirements.

Strategic Initiatives

Proposed amended Rule 67.3 is in alignment with the Environment Initiative of the County's Strategic Plan because it maintains virtually all of the VOC emission reductions being achieved under the rule and thus preserves air quality and helps protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, and meet federal and state mandates.

While amended Rule 67.3 could allow some increase in VOC emissions from limited use of specialty coatings by business, its effect is insignificant. Amended Rule 67.3 appropriately balances preserving air quality, protecting public health, and meeting economic development needs.

Respectfully submitted,

Richard J. Smith

ROBERT R. COPPER
Deputy Chief Administrative Officer

RICHARD J. SMITH
Air Pollution Control Officer

Attachments

A. Initial Study and Negative Declaration
B. Resolution Adopting the Negative Declaration
C. Resolution Amending Rule 67.3 of the District's Rules and Regulations
D. Change Copy of Rule 67.3
E. Comparative Analysis
F. Workshop Report

SUBJECT: AMENDMENT OF RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS (District: All)

AGENDA ITEM INFORMATION SHEET

CONCURRENCE(S)

COUNTY COUNSEL REVIEW	[X] Yes TD 3/18/03	
Written disclosure per County Charter Section 1000.1 required	[ ] Yes	[X] No
GROUP/AGENCY FINANCE DIRECTOR	[ ] Yes	[X] N/A
CHIEF FINANCIAL OFFICER	[ ] Yes	[X] N/A
Requires Four Votes	[ ] Yes	[X] No
GROUP/AGENCY INFORMATION TECHNOLOGY DIRECTOR	[ ] Yes	[X] N/A
CHIEF TECHNOLOGY OFFICER	[ ] Yes	[X] N/A
DEPARTMENT OF HUMAN RESOURCES	[ ] Yes	[X] N/A

Other Concurrence(s): N/A

ORIGINATING DEPARTMENT: Air Pollution Control District, County of San Diego

CONTACT PERSON(S):

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AUTHORIZED REPRESENTATIVE: Richard J. Smith

Richard J. Smith, Air Pollution Control Officer

SUBJECT: AMENDMENT OF RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS (District: All)

AGENDA ITEM INFORMATION SHEET
(continued)

PREVIOUS RELEVANT BOARD ACTIONS:
November 1, 1994 (APCB #1), Provide EPA Required Documentation (5% Equivalency) for Rule Exemptions; October 16, 1990 (APCB #4), Correct EPA Identified Deficiencies; May 9, 1979 (APCB # 1), Approved Adoption of Rule 67.3.

BOARD POLICIES APPLICABLE:
N/A

BOARD POLICY STATEMENTS:
N/A

CONTRACT NUMBER(S):
N/A

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January 30, 2003

CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G Rev. 12/98)

1. PROJECT TITLE:

Proposed Amendments to Rule 67.3 – Metal Parts And Products Coating Operations

2. LEAD AGENCY NAME AND ADDRESS:

San Diego County Air Pollution Control District
9150 Chesapeake Drive
San Diego, California 92123-1096

3. LEAD AGENCY CONTACT:

Robert Reider
Supervising Air Resources Specialist
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E-mail: Robert.Reider@sdcounty.ca.gov

4. PARTICIPANTS IN THE PREPARATION OF THIS INITIAL STUDY:

San Diego County Air Pollution Control District
Robert Reider, Supervising Air Resources Specialist
Natalie Zlotin, Senior Air Pollution Control Engineer
Adeline Suson, Air Pollution Control Engineer

San Diego County Office of County Counsel
Terence Dutton, Senior Deputy County Counsel

5. PROJECT LOCATION:

The project applies within the jurisdiction of the San Diego County Air Pollution Control District, which covers the entire area within the incorporated and unincorporated portions of San Diego County, the southwestern-most county in the State of California (Figure 1). San Diego County encompasses 4,260 square miles and is bounded on the north by Orange and Riverside Counties, on the east by Imperial County, on the west by the Pacific Ocean, and on the south by the State of Baja California, Mexico.

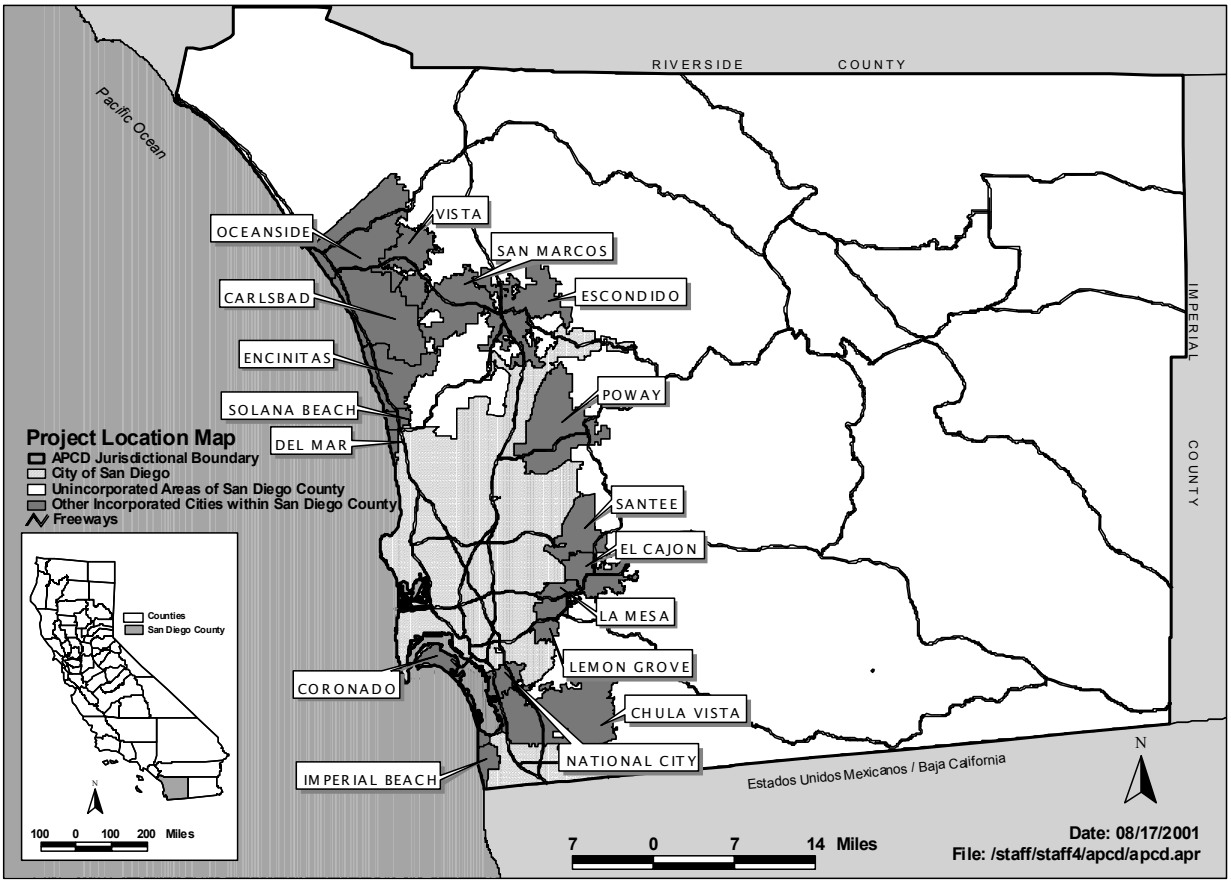

Figure 1. Project Location San Diego County

6. PROJECT SPONSOR'S NAME AND ADDRESS:

San Diego County Air Pollution Control District
9150 Chesapeake Drive
San Diego, CA 92123-1096

7. PROJECT DESCRIPTION:

Rule 67.3

The San Diego County Air Pollution Control District proposes to amend Rule 67.3 – Metal Parts and Products Coating Operations. Initially adopted in 1979, Rule 67.3 regulates emissions of volatile organic compounds (VOC) from surface coating of metal parts and products and related processes. Surface coating is a process of applying a protective, decorative, or functional coating to a substrate. Coating materials include, but are not limited to, paints, stains, sealers, topcoats, basecoats, primers, and inks. When applied, solvents in the coatings and surface preparation

and cleaning materials evaporate into the atmosphere, emitting VOC. These VOC contribute to the formation of ground-level ozone, the primary constituent of smog.

Proposed Amendments

The District proposes to amend Rule 67.3 to clarify specified definitions and provide a limited exemption for low-use coatings used at a stationary source for specialty, custom-made signs or sign-related objects, including those fabricated either from metals or from the combination of metals with other substrates, where the coatings of all substrates match exactly in appearance and performance. A facility would be allowed to use up to 20 gallons of such coatings in any consecutive 12-month period, provided the VOC content does not exceed 780 grams per liter, as applied, less water and less exempt compounds. The current VOC limit for such coatings is 340 grams per liter.

Rationale

The proposed amendments to Rule 67.3 are necessary due to the unavailability of VOC-compliant coatings providing satisfactory performance in the specified application. Limited use of non-compliant coatings in the specified application has previously occurred under variances granted by the Air Pollution Control District Hearing Board.[1] Corresponding Rule 67.3 amendments are now proposed, in light of the continued unavailability of compliant coatings.

RACT Requirements

Rule 67.3 was developed pursuant to federal requirements for Reasonably Available Control Technology (RACT)[2] and is included in the federally approved State Implementation Plan (SIP).[3] Consequently, any revisions to Rule 67.3 must be submitted to the U.S. Environmental Protection Agency (EPA) for approval into the SIP. It is anticipated that the proposed amendments are readily approvable by EPA, as discussed in Section 8 below.

8. REGULATORY AND ENVIRONMENTAL ISSUES:

RACT Evaluation

The proposed amendments to Rule 67.3 vary slightly from the general federal RACT requirements. However, EPA policy guidance allows deviation from a RACT standard upon a demonstration that the departure results in "no significant emissions

[1] Variance Nos. 1851, 2050, 2510, 2971, 3213, 3340, and 3492.

[2] Clean Air Act, Sections 172(c)(1) and 182(a)(2)(A); see also "Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products," EPA, June 1978.

[3] Federal Register, Volume 62, Page 14639 (62 FR 14639), March 27, 1997.

differential." [4] Additional EPA policy guidance indicates that excess emissions resulting from an exemption are considered de minimis (and therefore do not represent a significant emissions differential and the 5% analysis is not required) if they represent less than 1% of the allowable emissions from the source category. [5] Indeed, as discussed below, excess emissions resulting from the proposed limited exemption are well below the 1% threshold, and therefore are considered de minimis.

Worst-Case Emissions Impact

According to the District's permit files, there are 262 companies in San Diego County involved in metal parts and products coating operations, emitting a combined total of 410 tons per year of VOC emissions. The proposed exemption to Rule 67.3 may affect up to 10 of these companies, which manufacture specialty signs. Assuming, as a worst-case scenario, that each of the 10 companies would use the allowed amount of 20 gallons of coatings per year, the total excess VOC emissions from these operations would be 700 pounds (0.35 tons) per year. This worst-case scenario represents less than 0.1 % (0.35/410) of total emissions from this source category, which is well below EPA's 1% de minimis threshold. Therefore, excess emissions resulting from the proposed limited exemption to Rule 67.3 are de minimis and will not delay progress in attaining ambient air standards for ozone. (See further discussion in Section 13 below.)

9. ENVIRONMENTAL SETTING:

Topography

San Diego County is divided by the Laguna Mountain Range, which runs approximately parallel to the coast about 45 miles inland and separates the coastal area from the desert portion of the County. The Laguna Mountains reach peaks of over 6,000 feet with Hot Springs Mountain peak rising to 6,533 feet, the highest point in the county. The coastal region is made up of coastal terraces that rise from the ocean into wide mesas which then, moving farther east, transition into the Laguna Foothills. Farther east, the topography gradually rises to the rugged mountains. On the east side, the mountains drop off rapidly to the Anza-Borrego Desert, which is characterized by several broken mountain ranges with desert valleys in between. To the north of the County are the Santa Ana Mountains which run along the coast of Orange County, turning east to join with the Laguna Mountains near the San Diego-Orange County border.

[4] "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations - Clarification to Appendix D of November 24, 1987 Federal Register," EPA, May 25, 1988 (referred to as the Bluebook).

[5] "Screening Analysis for 5% De Minimis Determinations for Coating Rules," Andrew Steckel, Rulemaking Office Chief, EPA Region IX, December 4, 2002.

Climatology

The climate of San Diego County, as with all of Southern California, is largely dominated by the strength and position of the semi-permanent, high-pressure system over the Pacific Ocean (known as the Pacific High). This high-pressure ridge over the West Coast often creates a pattern of late-night and early-morning low clouds, hazy afternoon sunshine, daytime onshore breezes, and little temperature variation year-round. The climatic classification for San Diego is a Mediterranean climate, with warm, dry summers and mild, wet winters. Average annual precipitation ranges from approximately 10 inches on the coast to over 30 inches in the mountains to the east (the desert regions of San Diego County generally receive between 4 and 6 inches per year).

The favorable climate of San Diego works to create air pollution problems. Sinking, or subsiding air from the Pacific High creates a temperature inversion (known as a subsidence inversion), which acts as a lid to vertical dispersion of pollutants. Weak summertime pressure gradients further limit horizontal dispersion of pollutants in the mixed layer below the subsidence inversion. Poorly dispersed anthropogenic (man made) emissions, combined with strong sunshine, lead to photochemical reactions, create ozone in this surface layer.

Daytime onshore flow (i.e., sea breeze) and nighttime offshore flow (i.e., land breeze) are quite common in Southern California. The sea breeze helps to moderate daytime temperatures in the western portion of San Diego County, which greatly adds to the climatic draw of the region. This also leads to emissions being blown out to sea at night and returning to land the following day. Under certain conditions, this atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County, which often results in high ozone concentrations being measured at San Diego County air pollution monitoring stations. Transport of air pollutants from Los Angeles to San Diego has also been shown to occur aloft within the stable layer of the elevated subsidence inversion. In this layer, removed from fresh emissions of oxides of nitrogen, which would scavenge and reduce ozone concentrations, high levels of ozone are transported into San Diego County.

Ambient Air Quality Standards

National and state ambient air quality standards are established for criteria pollutants, which are widespread, common air contaminants known to be harmful to human health and welfare. The criteria pollutants are ozone, inhalable particulate matter, carbon monoxide, nitrogen dioxide, lead, and sulfur dioxide. Additional state standards have been established for sulfates and hydrogen sulfide.

The standards are set to protect the elderly, very young, and chronically sensitive portions of the population, and are required to include a reasonable margin of safety

to protect against potential hazards which research has not yet identified. In some cases, the state standards provide a wider margin of safety than the national standards. An area that does not meet a particular standard is designated as a nonattainment area for that pollutant.

Air Quality Status

The District operates an extensive ambient air monitoring network, continuously monitoring air pollution levels at numerous sites throughout San Diego County in compliance with federal and state requirements. Data generated at these monitors are used to define the nature and severity of air pollution in San Diego County and to determine attainment status.

San Diego County has generally experienced substantial improvement in ambient air quality over the past several years, demonstrating emission control measures are working. Of the six criteria air pollutants regulated by EPA, and eight regulated by California Air Resources Board (ARB), only ozone and inhalable particulate matter occur in concentrations sufficient to violate either national or state standards in San Diego County.

In 2001, San Diego County reached an important milestone for regional air quality improvement when it attained the national one-hour ambient air quality standard for ozone. Attainment clearly demonstrates emission control measures are working and substantial progress has been made to address the acute, or short-term, health issues associated with exposure to ozone. Attainment also represents a significant milestone in the region's continuing progress toward attaining the more health-protective national eight-hour and state one-hour ozone standards. As discussed in Section 13 below, the proposed project will not delay progress in attaining the ozone standards, and emissions of no other criteria pollutants will increase.

Toxic Air Contaminants. Two of the District's air monitoring stations, in Chula Vista and El Cajon, measure toxic air contaminants. These are constituents of certain VOC, particulate matter, and other contaminants that are believed to be carcinogenic with no identified threshold below which no adverse health effects occur. The monitoring results indicate a 50% reduction since 1990 in the ambient incremental cancer risk measured at these stations.[6] As discussed in Section 13 below, the proposed project will not result in any significant increase in emissions of toxic air contaminants or in health risks.

[6] "Incremental cancer risk" is a calculation of possible additional cases of cancer, over a lifetime of exposure to the various toxic air contaminants, for every one million people.

10. OTHER PUBLIC AGENCY INVOLVEMENT:

Identify public agencies whose approvals are, or may be, required (e.g., permits, financing approval, or participation agreement):

Agency	Action
ARB	Submit amended Rule 67.3 to EPA for approval into the SIP.
EPA	Approval into the SIP.

11. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below, if any, would be potentially affected by this project.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology / Soils
☐ Hazards / Haz. Materials	☐ Hydrology/Water Quality	☐ Land Use / Planning
☐ Mineral Resources	☐ Noise	☐ Population / Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities / Service Systems	☐ Mandatory Findings of Significance	

☑ No Potentially Significant Impacts

12. DETERMINATION:

On the basis of this initial evaluation:

☑ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

INITIAL STUDY:
Proposed Amendments to Rule 67.3 – Metal Parts And Products Coating Operations

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that, although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

☐ On the basis of this Initial Study, I believe the following: there are no new significant environmental effects and no substantial increase in severity of effects identified in an earlier NEGATIVE DECLARATION or ENVIRONMENTAL IMPACT REPORT for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted or Environmental Impact Report was certified. Therefore, the previously adopted NEGATIVE DECLARATION or certified ENVIRONMENTAL IMPACT REPORT will be considered adequate upon completion of an ADDENDUM to reflect minor technical changes.

☐ On the basis of this Initial Study, I believe the following: new significant environmental effects or a substantial increase in severity of effects identified in an earlier Negative Declaration or Environmental Impact Report for the proposed project or property are present as the result of either 1) changes in the project; 2) changes in circumstances under which the project is undertaken; or 3) new information which could not have been known without the exercise of reasonable diligence at the time the original earlier Negative Declaration or Environmental Impact Report was adopted. Therefore, a SUBSEQUENT/SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required.

Robert C Reider — ***Signature***

1/31/03 — ***Date***

Robert C. Reider — ***Printed Name***

Supervising Air Resources Specialist — ***Title***

13. EVALUATION OF ENVIRONMENTAL IMPACTS:

Instructions for Environmental Checklist Form[7]

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report is required.

4. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act process, an effect has been adequately analyzed in an earlier EIR or negative declaration. In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

5. Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

6. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance.

[7] Based on Appendix G of the Guidelines for Implementation of the California Environmental Quality Act (14 CCR, Section 15000 et seq.).

Environmental Checklist

		Potentially Significant Impact	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:			
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☑
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☑
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☑

(a) through (d): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not require the construction of any building, structure, or other visual obstruction; would not have a substantial adverse effect on a scenic vista; would not substantially damage scenic resources; would not substantially degrade the existing visual character or quality of the surroundings; and would not create a new source of light or glare adversely affecting day or nighttime views. For these reasons, project implementation will not have a significant adverse impact on aesthetics.

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		Potentially Significant Impact	Less Than Significant Impact	No Impact
II.	**AGRICULTURAL RESOURCES.** Would the project:			
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☑

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☑
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☑

(a) through (c): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not require the taking of any land for construction of any building or structure; would not convert prime or unique farmland or farmland of statewide importance to non-agricultural use; would not conflict with existing zoning for agricultural use, or a Williamson contract; and would not involve other changes that might ultimately result in the conversion of farmland to non-agricultural use. For these reasons, project implementation will not have a significant adverse impact on agricultural resources.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
III. AIR QUALITY. Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☑	☐
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	☐	☑	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☑	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☑	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☑

(a) The applicable air quality plan is the SIP. As discussed in Sections 7 and 8 above, the proposed amendments to Rule 67.3 are anticipated to be readily approvable by

EPA for inclusion into the SIP. Approval into the SIP will ensure that the project does not conflict with or obstruct implementation of the applicable air quality plan.

(b) through (d): As discussed in Section 8 above, total excess VOC emissions resulting from project implementation would be no more than 700 pounds per year. Pursuant to EPA policy guidance, this level of emissions increase would be de minimis. This same conclusion can be made based upon a "rollback" analysis conducted for the proposed project, which is an approach to assessing the potential impact of emission changes on ambient ozone levels.[8,] A rollback analysis assumes a direct correlation between ozone-precursor emissions and ambient ozone levels. Results of the rollback analysis indicate that project implementation would have no impact on peak hourly or eight-hour ozone concentrations.[9]

Toxic Air Contaminants. VOC emissions from coating operations contain toxic compounds. Consequently, the project would result in a small increase of emissions of toxic air contaminants from affected facilities. Potential emissions of toxic air contaminants were compared to screening emission rates established pursuant to District Rule 1200 (Toxic Air Contaminants – New Source Review). The screening rates are health protective and were developed as a tool to evaluate toxic emissions. Emissions below screening rates meet cancer risk standards of Rule 1200 and are considered de minimis. Emissions exceeding screening rates require more analysis using a health risk assessment, but do not necessarily present a health hazard.

Potential project-related emission increases at a representative facility were compared to toxic screening emission rates to identify the ratio of potential emissions to allowable emissions for applicable toxic compounds. A hypothetical coatings operation using coatings with a relatively higher content of toxic compounds was selected for worst-case analysis purposes. To be conservative, the effect of each toxic compound is assumed to be additive. If the total sum of ratios of potential emissions to screening rates is less than 1.0, the toxic emissions at the facility meet Rule 1200 standards and are considered de minimis.

Results of the screening analysis are presented in Table 1. The total sum of ratios of potential emissions to allowable emissions is less than 1.0. Therefore, potential toxic emissions are considered de minimis and the project will not result in a significant increase of toxic air contaminants.

[8] See "Guidance for Improving Weight of Evidence Through Identification of Additional Emission Reductions, Not Modeled," U.S. Environmental Protection Agency, November 1999; see also 1999 Federal Register, Volume 64, page 70322; see also "Staff Report on Approval of a Revision to the Ozone State Implementation Plan for the San Francisco Bay Area," California Air Resources Board, June 26, 2001.

[9] The roll-back analysis is on file and available for review at the San Diego County Air Pollution Control District, 9150 Chesapeake Drive, San Diego, California 92123-1096; the custodian is Robert C. Reider.

Table 1.
Toxic Air Contaminant Screening Analysis

Worst-Case Coating	Toxic Air Contaminant	Estimated Emissions[a]		Toxic Air Contaminant Screening Rates		Ratio	
		lbs/hour	lbs/year	lbs/hour	lbs/year	Hourly	Yearly
Epoxy Primer	Isopropyl Alcohol	2.17E-02	2.89E-01	3.90E-01	2.11E05	5.56E-02	1.37E-06
	Methyl Ethyl Ketone	6.50E-02	8.67E-01	1.60E00	3.01E04	4.06E-02	2.88E-05
	Toluene	2.17E-02	2.89E-01	4.50E00	9.04E03	4.81E-03	3.20E-05
	Sulfates	8.12E-04	1.54E-06	1.50E-02	7.53E02	5.42E-02	2.04E-09
	Hexavalent Chromium	2.52E-04	4.78E-07	NA	2.00E-04	NA	2.39E-03
Catalyst	Isopropyl Alcohol	5.98E-02	1.91E01	3.90E-01	2.11E05	1.53E-01	9.08E-05
	Toluene	1.50E-02	4.79E00	4.50E00	9.04E03	3.32E-03	5.29E-04
	Xylene	1.50E-02	4.79E00	2.70E00	2.11E04	5.54E-03	2.27E-04
	Propylene Glycol	1.50E-02	4.79E00	NA	2.11E05	NA	2.27E-05
					Sum of Ratios	3.17E-01	3.32E-03
					Less than 1.0?	Yes	Yes

[a] Assumed usage: 20 gallons/year, 0.25 gallons/day.
Assumed efficiencies: fallout (65%); transfer (60%); capture (75%); control (90%)

Conclusion. Based on the above analysis, project implementation will not violate any air quality standard or contribute to an existing or projected air quality violation; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard; or expose sensitive receptors to substantial pollutant concentrations.

(e): Existing District Rule 51, Nuisance, prohibits objectionable odors affecting a substantial number of people. Rule 51 would continue to apply following implementation of the proposed project. Therefore, no significant odor impacts are anticipated as a result of project implementation.

Based on the above discussion, project implementation will not have a significant adverse impact on air quality.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☑
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☑
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☑
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☑
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☑

(a) through (f): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a

specialized application. (See "Project Description" in Section 7 above.) Project implementation would not require any disturbance of undisturbed habitat; would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; would not have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means; would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and would not conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. For these reasons, project implementation will not have a significant adverse impact on biological resources.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	☐	☐	☑
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?	☐	☐	☑
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☑
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☑

(a) through (d): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project

implementation would not change historic, archaeological, or paleontological resources or unique geologic features; and would not disturb human remains. For these reasons, project implementation will not have a significant adverse impact on cultural resources.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
VI. GEOLOGY / SOILS. Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☑
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☑
• Strong seismic ground shaking?	☐	☐	☑
• Seismic–related ground failure, including liquefaction?	☐	☐	☑
• Landslides?	☐	☐	☑
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑
c) Be located on a geologic unit or soil that is unstable or that would become unstable due to the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☑
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☑

(a) through (e): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a

specialized application. (See "Project Description" in Section 7 above.) Project implementation would not require any activities which would expose people to the risk of loss, injury, or death associated with earthquakes, seismic ground shaking, seismic-related ground failure or landslides; would not require any construction activities that would create soil erosion or loss of topsoil; would not require the construction of any building or structure, thereby resulting in a potential to be located on an unstable geologic unit or on expansive soil; and would not require the installation of septic tanks or wastewater systems. For these reasons, project implementation will not have a significant adverse impact on geology/soils.

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		Potentially Significant Impact	Less Than Significant Impact	No Impact
VII.	**HAZARDS / HAZARDOUS MATERIALS.** Would the project:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	☐	☐	☑
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑
c)	Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☑
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☑
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☑

f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☑
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☑
i)	Significantly increased fire hazard in areas with flammable materials?	☐	☐	☑

(a) through (i): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not require the routine transport, use, and disposal of hazardous materials; would not create a significant hazard to the public, or emit hazardous emissions/handle hazardous materials within one-quarter mile of an existing or proposed school; would not require the construction of any building, structure or facility which could potentially be located on a site pursuant to Government Code §65962.5, or located within an airport land use plan, within two miles of a public airport or within the vicinity of a private airstrip; would not interfere with an adopted emergency response or evacuation plan; would not expose people or structures to wildland fires; and would not increase fire hazards in areas with flammable materials. For these reasons, project implementation will not have a significant adverse impact regarding hazards/hazardous materials.

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		Potentially Significant Impact	Less Than Significant Impact	No Impact
VIII.	**HYDROLOGY / WATER QUALITY.** Would the project:			
a)	Violate any water quality standards or waste discharge requirements?	☐	☐	☑
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or	☐	☐	☑

	a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			
c)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☑
d)	Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☑
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☑
f)	Otherwise substantially degrade water quality?	☐	☐	☑
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☑
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flaws?	☐	☐	☑
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☑
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☑
k)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☑
l)	Require or result in the construction of new water or wastewater treatment	☐	☐	☑

facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			
m) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑
n) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☑
o) Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☑

(a) through (o): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not violate any water quality standards or waste discharge requirements; would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge; would not require construction or other activities which could substantially alter the existing drainage pattern of a site or area in a manner resulting in substantial erosion or siltation on- or off-site; would not require construction or other activities which could substantially increase the amount of runoff water in a manner resulting in substantial flooding or erosion or siltation on- or off-site, or which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; would not otherwise substantially degrade water quality; would not require placing housing or structures within a 100-year flood hazard area; would not result in exposing people or structures to a significant risk of loss, injury, or death, or inundation by seiche, tsunami, or mudflow; would not result in an exceedance of wastewater treatment requirements, require or result in the construction of new water or wastewater treatment or storm water drainage facilities or expansion of existing facilities; and would not affect water supplies. For these reasons, project implementation will not have a significant adverse impact on hydrology/water quality.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
IX. LAND USE / PLANNING. Would the project:			
a) Physically divide an established community?	☐	☐	☑
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑
c) Conflict with any applicable habitat conservation or natural community conservation plan?	☐	☐	☑

(a) through (c): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Local governments determine land use and planning considerations, and no land use or planning requirements would be altered by the proposed project. Project implementation would not physically divide an established community; would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; and would not conflict with any applicable habitat conservation or natural community conservation plan. For these reasons, project implementation will not have a significant adverse impact on land use/planning.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
X. MINERAL RESOURCES. Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☑

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☑

(a) and (b): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not result in the loss of availability of known mineral resources or the loss of availability of a locally important mineral resource recovery site. For these reasons, project implementation will not have a significant adverse impact on mineral resources.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XI. NOISE. Would the project result in:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☑
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☑
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☑

(a) through (f): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not expose persons to noise levels in excess of applicable standards; would not expose people to excessive groundborne vibration or noise; would not result in a substantial permanent, temporary, or periodic increase in ambient noise levels; an would not affect any airport land use plan or private airstrip. For these reasons, project implementation will not have a significant adverse noise impact.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XII. POPULATION / HOUSING. Would the project:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	☐	☐	☑
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☑
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☑

(a) through (c): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not induce substantial growth, nor displace housing or people, requiring the construction of replacement housing. For these reasons, project implementation will not have a significant adverse impact on population/housing.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES. Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
a) Fire protection?	☐	☐	☑
b) Police protection?	☐	☐	☑
c) Schools?	☐	☐	☑
d) Parks?	☐	☐	☑
e) Other public facilities?	☐	☐	☑

(a) through (e): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Project implementation would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities; would not result in the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives as they relate to fire protection, police protection, schools, parks, or other public services or facilities. For these reasons, project implementation will not have a significant adverse impact on public services.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XIV. RECREATION.			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☑
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☑

(a) and (b): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) No provisions of this proposed project will increase the need for additional parks or other recreational facilities, or cause the deterioration of existing facilities. The project does not require the development of new recreational facilities or require the construction or expansion of recreational facilities that might have an adverse effect on the environment. For these reasons, project implementation will not have a significant adverse impact on recreation.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XV. TRANSPORTATION / TRAFFIC. Would the project:			
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☑
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☑

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☑
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☑
e) Result in inadequate emergency access?	☐	☐	☑
f) Result in inadequate parking capacity?	☐	☐	☑
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	☐	☐	☑

(a) through (g): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) The project would not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; would not exceed, either individually or cumulatively, a level of standard established by the regional congestion management agency for any road or highway; would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; would not substantially increase hazards due to a design feature or incompatible uses; would not result in inadequate emergency access or parking capacity; and would not conflict with adopted policies, plans, or programs supporting alternative transportation. For these reasons, project implementation will not have a significant adverse impact on transportation/traffic.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVI. UTILITIES / SERVICE SYSTEMS. Would the project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☑
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☑
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☑
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☑
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☑

(a) through (g). The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) The project would not exceed wastewater treatment requirements of the regional water quality control board; would not require or result in the construction of new water, wastewater treatment, or storm water drainage facilities, or expansion of existing facilities; would not require water supplies in excess of existing entitlements and resources or require new or expanded entitlements; would not require additional wastewater treatment capacity or landfill capacity; and would comply with federal, state, and local statutes and regulations related to solid waste. For these reasons, project implementation will not have a significant adverse impact on utilities/service systems.

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	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE.			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☑
b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☑
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☑

(a) Through (c): The proposed project consists of amendments to District Rule 67.3 that clarify specified definitions and provide a limited exemption for low-use coatings in a specialized application. (See "Project Description" in Section 7 above.) Based on the analyses presented herein, it is concluded that the project (1) would not: have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; (2) would not have impacts that are individually limited, but cumulatively considerable; and (3) would not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly. For these reasons, project implementation will not have a significant adverse impact with respect to the mandatory findings of significance.

Air Pollution Control Board

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

January 30, 2003

NEGATIVE DECLARATION

PROPOSED AMENDMENTS TO RULE 67.3 – METAL PARTS AND PRODUCTS COATING OPERATIONS

1. PROJECT TITLE:

Proposed Amendments to Rule 67.3 – Metal Parts And Products Coating Operations

2. PROJECT APPLICANT:

San Diego County Air Pollution Control District
9150 Chesapeake Drive
San Diego, California 92123-1096

3. PROJECT LOCATION:

The project applies within the jurisdiction of the San Diego County Air Pollution Control District, which covers the entire area within the incorporated and unincorporated portions of San Diego County, the southwestern-most county in the State of California. San Diego County encompasses approximately 4,260 square miles and is bounded on the north by Orange and Riverside Counties, on the east by Imperial County, on the west by the Pacific Ocean, and on the south by the State of Baja California, Mexico.

4. PROJECT DESCRIPTION:

The San Diego County Air Pollution Control District proposes to amend Rule 67.3 – Metal Parts and Products Coating Operations. Rule 67.3 regulates emissions of volatile organic compounds (VOC) from surface coating of metal parts and products and related processes. Surface coating is a process of applying a protective, decorative, or functional coating to a substrate. Coating materials include, but are not limited to, paints, stains, sealers, topcoats, basecoats, primers, and inks. When applied, solvents in the coatings and surface preparation and cleaning materials evaporate into the atmosphere, emitting VOC. These VOC contribute to the formation of ground-level ozone, the primary constituent of smog.

The proposed amendments to Rule 67.3 clarify specified definitions and provide a limited exemption for low-use coatings used at a stationary source for specialty, custom-made signs or sign-related objects, including those fabricated either from metals or from the combination of metals with other substrates, where the coatings of all substrates match exactly in appearance and performance. A facility would be allowed to use up to

20 gallons of such coatings in any consecutive 12-month period, provided the VOC content does not exceed 780 grams per liter, as applied, less water and less exempt compounds. The current VOC limit for such coatings is 340 grams per liter.

The proposed amendments to Rule 67.3 are necessary due to the unavailability of VOC-compliant coatings providing satisfactory performance in the specified application. Limited use of non-compliant coatings in this application has previously occurred under variances granted by the District Hearing Board. Corresponding Rule 67.3 amendments are now proposed, in light of the continued unavailability of compliant coatings for the specified application.

5. FINDINGS:

The San Diego County Air Pollution Control District, acting as lead agency, has completed an Initial Study for the project pursuant to the California Environmental Quality Act. The Initial Study shows that the proposed amendments to Rule 67.3 will not conflict with or obstruct air quality plan implementation; violate any ambient air quality standard, or contribute substantially to an existing or projected air quality violation; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial criteria pollutant concentrations; nor create objectionable odors affecting a substantial number of people. Based on the Initial Study and the entire record before the District, there is no substantial evidence that the project may have a significant adverse effect on the environment, and the adoption of the proposed amendments to Rule 67.3 does not require preparation of an Environmental Impact Report.

This Negative Declaration reflects the independent judgment of the decision-making authority.

6. REQUIRED MITIGATION MEASURES:

No mitigation measures are required.

7. CRITICAL PROJECT DESIGN ELEMENTS THAT MUST BECOME CONDITIONS OF APPROVAL:

None required.

8. LOCATION AND CUSTODIAN OF RECORD:

The documents and other materials on which the proposed decision to adopt the proposed amendments to Rule 67.3 is based are located at the San Diego County Air Pollution Control District, 9150 Chesapeake Drive, San Diego, California 92123-1096; the custodian is Richard J. Smith, Air Pollution Control Officer.

Note: This Negative Declaration becomes final upon approval by the San Diego County Air Pollution Control Board.

Resolution No. 03-065

Re Rules and Regulations of the)
Air Pollution Control District)
of San Diego County . . . . . .)

RESOLUTION ADOPTING
THE NEGATIVE DECLARATION FOR
PROPOSED AMENDMENTS TO RULE 67.3

On motion of Member Slater, seconded by Member Roberts, the following Resolution is adopted:

WHEREAS, pursuant to the California Environmental Quality Act, adoption of the proposed amendments to Rule 67.3 is a project requiring environmental review; and

WHEREAS, the San Diego County Air Pollution Control District has the principal responsibility for adopting the proposed amendments to Rule 67.3 and, therefore, pursuant to the California Environmental Quality Act, is the lead agency for the requisite environmental review; and

WHEREAS, pursuant to the California Environmental Quality Act, an Initial Study was prepared evaluating potential environmental consequences resulting from the proposed amendments to Rule 67.3; and

WHEREAS, the Initial Study revealed no substantial evidence that the proposed amendments to Rule 67.3 may have a significant adverse environmental effect; and

WHEREAS, based on the Initial Study findings, a draft Negative Declaration was prepared pursuant to the California Environmental Quality Act; and

WHEREAS, the draft Negative Declaration was circulated for a 30-day public comment period and no comments were received; and

WHEREAS, the final Negative Declaration concludes there is no substantial evidence indicating the proposed amendments to Rule 67.3 will have a significant adverse impact on the environment; and

WHEREAS, the San Diego County Air Pollution Control Board reviewed and considered the information contained in the Initial Study and final Negative Declaration; and

WHEREAS, the documents and other materials on which the decision to adopt the Negative Declaration is based are located at the San Diego County Air Pollution Control District, 9150 Chesapeake Drive, San Diego, California 92123-1096; the custodian is Richard J. Smith, Director.

NOW, THEREFORE, IT IS RESOLVED AND ORDERED by the San Diego County Air Pollution Control Board that the Initial Study and Negative Declaration reflect the Board's independent judgment and analysis of potential environmental consequences resulting from adoption of the proposed amendments to Rule 67.3; and

IT IS FURTHER RESOLVED AND ORDERED that, considering the entire record before the Board, there is no substantial evidence that adoption of the proposed amendments to Rule 67.3 will have a significant adverse effect upon the environment; and

IT IS FURTHER RESOLVED AND ORDERED that the Negative Declaration is hereby adopted as a true and complete statement of potential environmental consequences resulting from adoption of the proposed amendments to Rule 67.3; and

IT IS FURTHER RESOLVED AND ORDERED that there is no evidence in the entire record that adoption of the proposed amendments to Rule 67.3 will have an adverse effect on wildlife resources, and on the basis of substantial evidence, the presumption of adverse effect in California Code of Regulations, Title 14, Section 753.5(d) has been rebutted.

PASSED AND ADOPTED by the Air Pollution Control Board of the San Diego County Air Pollution Control District, State of California, this 9th day of April, 2003, by the following votes:

AYES: Cox, Jacob, Slater, Roberts, Horn

APPROVED AS TO FORM AND LEGALITY
COUNTY COUNSEL
BY Dutton
SENIOR DEPUTY

STATE OF CALIFORNIA)
County of San Diego)SS

I hereby certify that the foregoing is a full, true and correct copy of the Original Resolution entered in the Minutes of the Air Pollution Control Board.

THOMAS J. PASTUSZKA
Clerk of the Air Pollution Control Board

By: Denise McClendon
Denise McClendon, Deputy

No. 03-065
4/9/03 (APCB 1)

No. 03-066

Re Rules and Regulations of the)
Air Pollution Control District)
of San Diego County . . . . . .)

**RESOLUTION AMENDING RULE 67.3
OF REGULATION IV
OF THE RULES AND REGULATIONS OF THE
SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT**

On motion of Member Slater, seconded by Member Roberts, the following resolution is adopted:

WHEREAS, the San Diego County Air Pollution Control Board, pursuant to Section 40702 of the Health and Safety Code, adopted Rules and Regulations of the Air Pollution Control District of San Diego County; and

WHEREAS, said Board now desires to amend said Rules and Regulations; and

WHEREAS, notice has been given and a public hearing has been held relating to the amendment of said Rules and Regulations pursuant to Section 40725 of the Health and Safety Code.

NOW THEREFORE IT IS RESOLVED AND ORDERED by the San Diego County Air Pollution Control Board that the Rules and Regulations of the Air Pollution Control District of San Diego County be and hereby are amended as follows:

Amendments to Rule 67.3 are to read as follows:

RULE 67.3 METAL PARTS AND PRODUCTS COATING OPERATIONS
(Effective 5/9/79: Rev. 5/15/96; Rev. *(date of adoption)*)

(a) **APPLICABILITY**

(1) Except as otherwise provided in Section (b), this rule is applicable to the surface coating of metal parts and products.

(2) Any coating operation subject to the requirements of Rules 67.0, 67.4, 67.9 or 67.18 shall not be subject to this rule.

(3) Rule 66 shall not apply to any coating operation which is subject to this rule.

(4) Equipment used for cleaning and/or surface preparation of metal parts and products and also used for cleaning of coating application equipment for metal parts and products shall be subject to the applicable requirements of both Rules 67.3 and 67.6.

(b) **EXEMPTIONS** (Rev. *(date of adoption)*)

Any person claiming an exemption pursuant to Subsections (b)(1)(i), (b)(1)(ii), (b)(2)(i), (b)(3)(i) and/or (b)(3)(iii) shall maintain monthly purchase and daily usage records of coatings and/or cleaning materials, as applicable, containing volatile organic compounds (VOC) in order to substantiate the applicability of the claimed exemption. These records shall be maintained on site for three years and made available to the District upon request.

(1) The provisions of Sections (d), (e) and (f) shall not apply to the following:

(i) Any coating operation where 20 gallons or less of coatings are applied per consecutive 12-month period.

(ii) Any powder coating operation which uses less than 0.5 gallons per day of any surface preparation or cleaning material containing volatile organic compounds.

(iii) Coatings applied to motor vehicles, excluding the application of coatings to component parts or accessories during original manufacture.

(iv) Coatings applied using non-refillable handheld aerosol spray containers.

(v) Coatings applied to metal surfaces for the specific purpose of protecting the metal substrate from corrosive attack by storage battery electrolytes.

(vi) The application of the following coatings:

(A) Cathode coatings.

(B) Chemical milling maskants.

(C) Magnetic tape storage disks coatings.

(D) Safety indicating coatings.

(E) Solid film lubricants.

(F) Stencil coatings.

(G) Wet fastener installation coatings.

(2) The provisions of Subsection (d)(1) shall not apply to the following:

(i) Any coating operation which applies one gallon or less of coatings during each day of operation.

(ii) Any coatings that are applied by the use of air brushes with a coating capacity of two ounces (59.1 ml) or less.

(iii) Any coatings that are applied for touch-up operations.

(3) The provisions of Subsections (d)(2) and (d)(3) shall not apply to the following:

(i) Pretreatment wash primers with a VOC content, as applied, of less than 780 grams of VOC per liter of coating, less water and exempt compounds, provided that not more than 500 gallons of all pretreatment wash primers are used at a stationary source in each consecutive 12-month period.

(ii) High performance architectural coatings with a VOC content, as applied, of less than 750 grams of VOC per liter of coating, less water and exempt compounds, used at a stationary source which has continuously maintained a District Permit to Operate for each high performance architectural coating operation since November 1, 1993.

(iii) Coatings with a VOC content, as applied, not to exceed 780 grams of VOC per liter of coating, less water and exempt compounds, used at a stationary source for specialty, custom-made signs or sign-related objects, including those fabricated either from metals or from the combination of metals with other substrates such as foam, wood, glass and/or plastics, where the coating of all substrates must match exactly in appearance and performance. Not more than an aggregate total of 20 gallons of all such coatings shall be used on metal parts at a stationary source in each consecutive 12-month period. In addition to the records required by this Section (b), any person claiming this exemption shall also maintain records describing the specialty, custom-made object or sign, the coating performance standard required, and the specifications to which the object or sign was produced.

(c) **DEFINITIONS** (Rev. *(date of adoption)*)

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

(1) **"Adhesive"** means a substance applied to a metal surface for the sole purpose of bonding the metal surface with another metal or non-metal surface by attachment.

(2) **"Air-Dried Coating"** means any coating which is not heated above 90° C (194° F) for the purpose of curing or drying.

(3) **"Baked Coating"** means any coating which is cured or dried in an oven where the oven air temperature exceeds 90° C (194° F).

(4) **"Cathode Coating"** means a functional coating applied to an electrical cathode.

(5) **"Chemical Agent Resistant Coating (CARC)"** means a coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents and to conceal the equipment from detection.

(6) **"Chemical Milling Maskant"** means a coating applied directly to a metal part to protect surface areas during chemical milling, anodizing, aging, bonding, plating, etching, or other chemical surface operations.

(7) **"Coating"** means a material containing more than 20 grams per liter of VOC as applied, less water and exempt compounds, which can be applied as a thin layer to a substrate, and which dries or cures to form a continuous solid film, including but not limited to any paint, primer, varnish, stain, lacquer, enamel, shellac, sealant, or maskant, and excluding any adhesives, or preservative oils.

(8) **"Coating Operation"** means all steps involved in the application, drying and/or curing of surface coatings, including touch-up operations, and associated surface preparation and equipment cleaning.

(9) **"Dip Coat"** means a coating application method accomplished by dipping an object into coating.

(10) **"Electrostatic Spray"** means a coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.

(11) **"Exempt Compound"** means the same as defined in Rule 2.

(12) **"Flow Coat"** means a coating application method accomplished by flowing a stream of coating over an object.

(13) **"Hand Application Method"** means a coating application method accomplished by applying a coating by manually held, non-mechanically operated equipment. Such equipment includes paintbrushes, hand rollers, rags and sponges.

(14) **"Heat-Resistant Coating"** means any coating which during normal use must withstand a temperature of at least 204.4° C (400° F).

(15) **"High Gloss Coating"** means any coating which achieves at least 75% reflectance on a 60° meter.

(16) **"High Performance Architectural Coating"** means a coating used to protect architectural subsections which meets the specifications of the Architectural Aluminum Manufacturers Association publication AAMA 605.2-1992.

(17) **"High-Volume Low-Pressure (HVLP) Spray"** means a coating application method which uses pressurized air at a permanent pressure between 0.1 and 10.0 psig, not to exceed 10 psig, measured at the air cap of the coating application system.

(18) **"Magnetic Tape Storage Disk Coating"** means a coating used on a metal disk which stores data magnetically.

(19) **"Metallic Topcoat"** means a coating which contains more than 5 grams of elemental metal particles per liter of coating, as applied.

(20) **"Motor Vehicle"** has the same meaning as defined in Section 415 of the Vehicle Code.

(21) **"Powder Coating"** means any material applied as a dry (without a carrier) finely divided solid which, when melted and fused, adheres to the substrate as a paint film.

(22) **"Preservative Oils"** means any material which does not contain solids, and is applied to prevent corrosion or provide lubrication or both.

(23) **"Pretreatment Wash Primer"** means any coating which contains a minimum of 0.5 percent acid by weight and which is applied directly to bare metal surfaces and is necessary to provide surface etching and required adhesion for subsequent coatings.

(24) **"Primer"** means a coating applied for purposes of corrosion prevention, protection from the environment, functional fluid resistance and/or adhesion of subsequent coatings. A primer would also include a coating which is formulated to be used as a primer but which, in a specific application, is used as an initial and final coating without subsequent application of a topcoat.

(25) **"Roll Coat"** means a coating application method accomplished by rolling a coating onto a flat surface using a roll applicator.

(26) **"Safety Indicating Coating"** means a coating applied to pressurized air cylinders which undergoes a wide color change when exposed to a high temperature.

(27) **"Solar Absorbent Coating"** means a coating formulated for the sole purpose of absorbing solar radiation to produce heat.

(28) **"Solid Film Lubricant"** means a thin film coating of an organic binder system containing as its chief pigment material one or more of the following: molybdenum disulfide, graphite, polytetrafluoroethylene or other solids that act as a dry lubricant between meeting surfaces.

(29) **"Stationary Source"** has the same meaning as defined in Rule 20.1.

(30) **"Stencil Coating"** means any ink or coating which is rolled, brushed or applied by air brush or non-refillable handheld aerosol spray containers onto a template or stamp in order to add identifying letters and/or numbers to metal parts and products.

(31) **"Touch-up Operation"** means that portion of the coating operation which is incidental to the main coating process but necessary to cover minor imperfections or minor mechanical damage incurred prior to intended use, or to achieve coverage as required.

(32) **"Transfer Efficiency"** means the ratio of the weight of coating solids adhering to the part being coated to the weight of coating solids used in the application process expressed as a percentage.

(33) **"Volatile Organic Compounds (VOC)"** means any volatile compound of carbon, which may be emitted to the atmosphere during operations or activities subject to this rule, except methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, ammonium carbonate, and exempt compounds.

(34) **"VOC Content Per Volume of Coating, Less Water and Exempt Compounds"** means the same as defined in Rule 2 and calculated as specified in Subsection (b)(51) of that rule.

(35) **"VOC Content Per Volume of Material"** means the same as defined in Rule 2 and is calculated as specified in Subsection (b)(52) of that rule.

(36) **"Wet Fastener Installation Coating"** means a primer or sealant applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured.

(d) **STANDARDS**

(1) Application Equipment

Except as provided in Subsection (b)(2), no coatings shall be applied unless one of the following application methods is used:

(i) Electrostatic spray application, or

(ii) Flow coat application, or

(iii) Dip coat application, or

(iv) High-volume low-pressure (HVLP) spray application, or

(v) Roll coat, or

(vi) Hand application methods, or

(vii) Other coating application methods that are demonstrated to have a transfer efficiency at least equal to one of the above application methods, and which are used in such a manner that the parameters under which they were tested

are permanent features of the method. Such coating application methods shall be approved in writing prior to use by the Air Pollution Control Officer.

(2) VOC Limits

Except as provided in Subsection (d)(3), a person shall not apply any coating with a VOC content in excess of the following limits expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

Air-Dried Coatings	340
Baked Coatings	275

(3) VOC Limits for Specialty Coatings

A person shall not apply any specialty coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

CATEGORY	AIR-DRIED	BAKED
Chemical Agent Resistant	420	420
Heat Resistant	420	360
High Gloss	420	360
High Performance Architectural	420	420
Metallic Topcoat	420	360
Pretreatment Wash Primer	420	420
Solar Absorbent	420	360

The requirements of Subsections (d)(2) and (d)(3) may be met using an Alternative Emission Control Plan (AECP) that has been approved pursuant to Rule 67.1.

(4) Surface Preparation and Cleanup Solvents

Except as provided in Subsection (d)(5), a person shall not use VOC-containing materials for surface preparation or cleanup unless:

(i) The material contains 200 grams or less of VOC per liter of material; or

(ii) The material has an initial boiling point of 190° C (374° F) or greater; or

(iii) The material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F).

(5) Cleaning of Application Equipment

A person shall not use VOC containing materials for the cleaning of application equipment used in operations subject to this rule unless:

(i) The cleaning material contains 200 grams or less of VOC per liter of material; or

(ii) The cleaning material has an initial boiling point of 190° C (374° F) or greater; or

(iii) The cleaning material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F); or

(iv) The cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or

(v) The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or

(vi) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or

(vii) Other application equipment cleaning methods that are demonstrated to be as effective as any of the equipment described above in minimizing the emissions of VOC to the atmosphere, provided that the device has been tested and approved prior to use by the Air Pollution Control Officer.

(6) No person shall require for use or specify the application of a coating subject to this rule if such use or application results in a violation of this rule. This prohibition shall apply to all written or oral contracts under the terms of which any coating is applied to any metal part or product at any location within San Diego County.

(7) Emission reduction credits that would otherwise be approvable pursuant to District Rule 26.0 et seq., shall not be granted for that portion of the emission reductions attributable to VOC contents of coatings which are subject to this rule, greater than 420 grams per liter or the applicable VOC content limit of this rule, whichever is less.

(e) **CONTROL EQUIPMENT**

(1) In lieu of complying with the provisions of Subsections (d)(2), (d)(3), (d)(4), and/or (d)(5) of this rule, a person may use an air pollution control system which:

(i) Has been installed in accordance with an Authority to Construct; and

(ii) Includes an emission collection system which captures organic gaseous emissions, including emissions associated with applicable coating, equipment cleaning, and surface preparation operations, and transports the captured emissions to an air pollution control device; and

(iii) Has a combined emissions capture and control device efficiency of at least 85 percent by weight.

(2) A person electing to use control equipment pursuant to Section (e)(1) shall submit to the Air Pollution Control Officer for approval an Operation and Maintenance plan for the proposed emission control device and emission collection system and receive approval prior to operation of the control equipment. Thereafter, the plan can be modified, with Air Pollution Control Officer approval, as necessary to ensure compliance. Such plan shall:

(i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with Subsection (e)(1)(iii), such as temperature, pressure, and/or flow rate; and

(ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding the key system operating parameters.

(3) Upon approval of the Air Pollution Control Officer, a person subject to the requirements of Section (e) shall implement the Operation and Maintenance plan and shall comply with the provisions of the approved plan thereafter.

(f) **RECORDKEEPING**

All records shall be retained on site for at least three years, and shall be made available to the District upon request.

(1) Any person subject to the provisions of Subsections (d)(2), (d)(3), (d)(4) and/or (d)(5) of this rule shall maintain records in accordance with the following:

(i) Maintain a current list of coatings, surface preparation, and cleaning materials in use which provides all of the VOC data necessary to evaluate compliance, including but not limited to:

(A) manufacturer name and identification for each coating or coating component for multi-component coatings, (this includes any components such as bases, catalysts, thinners or reducers, when supplied in separate containers), surface preparation and cleaning material; and

(B) mix ratio of components; and

(C) VOC content, vapor pressure and/or initial boiling point, as applicable, for each coating, or coating component for multi-component coatings, surface preparation and cleaning material.

(ii) Maintain current documentation to demonstrate applicability of any specialty coating category pursuant to Subsection (d)(3) of this rule.

(iii) Maintain daily or monthly records of the amount of each coating or each coating component for multi-component coatings used. Maintain records of material additions to dip tanks used for dip coating applications.

(iv) Maintain daily or monthly records showing the amounts of each surface preparation and cleaning material used.

(v) Maintain records of the actual oven drying temperature, if applicable.

(2) Any person using control equipment pursuant to Section (e) of this rule shall:

(i) Maintain records in accordance with Subsection (f)(1); and

(ii) For all coating, cleaning, and/or surface preparation materials not in compliance with Subsections (d)(2), (d)(3), (d)(4), or (d)(5) of this rule, maintain daily records of the amount of each coating or each coating component for multi-component coatings, surface preparation and cleaning material used; and

(iii) Maintain daily records of key system operating parameters as approved in the Operation and Maintenance plan. Such records shall be sufficient to document continuous compliance with Subsection (e)(1)(iii) during periods of emission producing activities.

(g) **TEST METHODS**

(1) Measurement of heat resistance referenced in Subsection (c)(14) of this rule shall be conducted in accordance with ASTM Standard Test Method D2485-91.

(2) Measurement of coating reflectance referenced in Subsection (c)(15) of this rule shall be conducted in accordance with ASTM Standard Test Method D523-89.

(3) Measurement of elemental metal content referenced in Subsection (c)(19) of this rule shall be conducted and reported in accordance with the South Coast Air Quality Management District's Spectrographic Method 311.

(4) Measurement of pretreatment wash primer acid content referenced in Subsection (c)(23) of this rule shall be conducted in accordance with ASTM Standard Test Method D1613-91.

(5) Perfluorocarbon (PFC) compounds shall be assumed to be absent from a coating, cleaning, or surface preparation material subject to this rule unless a manufacturer of the material or a facility operator identifies the specific individual compound(s) and the amount(s) present in the material and provides an Environmental Protection Agency (EPA) and California Air Resources Board approved test method which can be used to quantify the specific compounds.

(6) Measurements of transfer efficiency subject to Subsection (d)(1)(vii) of this rule shall be conducted in accordance with the South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" as it exists on November 1, 1994.

(7) Measurement of the VOC content of coatings, surface preparation and cleaning materials subject to Subsections (d)(2), (d)(3), (d)(4)(i) or (d)(5)(i) of this rule shall be conducted in accordance with EPA Test Method 24 (40 CFR 60, Appendix A) as it exists on November 1, 1994.

(8) Measurement of the VOC content of ultraviolet radiation-cured coatings subject to Subsections (d)(2) or (d)(3) of this rule shall be conducted in accordance with ASTM Standard Test Method D5403-93. Measurement of the water content and exempt solvent content, if applicable, shall be conducted and reported in accordance with ASTM Standard Test Methods D 3792-91 and D 4457-85.

(9) Measurement of the initial boiling point of cleaning and surface preparation materials subject to Subsection (d)(4)(ii) and/or (d)(5)(ii) of this rule shall be conducted in accordance with ASTM Standard Test Method D1078-86 for distillation range of volatile organic liquids.

(10) Calculation of total VOC vapor pressure for materials subject to Subsection (d)(4)(iii) and/or (d)(5)(iii) of this rule shall be conducted in accordance with the District's "Procedures for Estimating the Vapor Pressure of VOC Mixtures" as it exists on November 1, 1994. If the vapor pressure of the liquid mixture, as calculated by this procedure, exceeds the limits specified in Subsection (d)(4)(iii) and/or (d)(5)(iii), the vapor pressure shall be determined in accordance with ASTM Standard Test Method D2879-86, Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM Standard Test Methods D3792-91 and D4457-85 and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM Test Method D2879-86 shall be corrected for partial pressure of water and exempt compounds.

(11) Measurement of solvent losses from alternative application cleaning equipment subject to Subsection (d)(5)(vii) shall be conducted and reported in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" as it exists on November 1, 1994.

(12) Measurement of control device efficiency subject to Subsection (e)(1) of this rule shall be conducted in accordance with EPA Methods 18 and/or 25A (40 CFR 60) as they exist on November 1, 1994 and in accordance with a protocol approved by the Air Pollution Control Officer.

(13) Measurement of the emission collection system capture efficiency subject to Subsection (e)(1) of this rule shall be conducted using a protocol approved by the Air Pollution Control Officer. Subsequent to the initial compliance demonstration period, applicable key system operating parameters, as approved by the Air Pollution Control Officer, shall be used as indirect verification that capture efficiency has not diminished.

IT IS FURTHER RESOLVED AND ORDERED that the amendments to Rule 67.3 of Regulation IV shall take effect upon adoption.

IT IS FURTHER RESOLVED AND ORDERED that the Air Pollution Control Officer submit amended Rule 67.3 of Regulation IV to the California Air Resources Board for transmittal to the federal Environmental Protection Agency for inclusion in the federal State Implementation Plan.

PASSED AND ADOPTED by the Air Pollution Control Board of the San Diego County Air Pollution Control District, State of California, this 9th day of April, 2003, by the following votes:

AYES: Cox, Jacob, Slater, Roberts, Horn

COUNTY COUNSEL

BY _____
SENIOR DEPUTY

STATE OF CALIFORNIA)
County of San Diego)SS

I hereby certify that the foregoing is a full, true and correct copy of the Original Resolution entered in the Minutes of the Air Pollution Control Board.

THOMAS J. PASTUSZKA
Clerk of the Air Pollution Control Board

By: Denise McClendon
Denise McClendon, Deputy

AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

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PROPOSED AMENDMENTS TO RULE 67.3

Proposed amendments to Rule 67.3 are to read as follows:

RULE 67.3 METAL PARTS AND PRODUCTS COATING OPERATIONS

(Effective 5/9/79: Rev. ~~Adopted & Effective~~ 5/15/96; Rev. *(date of adoption)*)

(a) **APPLICABILITY**

(1) Except as otherwise provided in Section (b), this rule is applicable to the surface coating of metal parts and products.

(2) Any coating operation subject to the requirements of Rules 67.0, 67.4, 67.9 or 67.18 shall not be subject to this rule.

(3) Rule 66 shall not apply to any coating operation which is subject to this rule.

(4) Equipment used for cleaning and/or surface preparation of metal parts and products and also used for cleaning of coating application equipment for metal parts and products shall be subject to the applicable requirements of both Rules 67.3 and 67.6.

(b) **EXEMPTIONS** (Rev. *(date of adoption)*)

Any person claiming an exemption pursuant to Subsections (b)(1)(i), (b)(1)(ii), (b)(2)(i), ~~and/or~~ (b)(3)(i) and/or (b)(3)(iii) shall maintain monthly purchase and daily usage records of coatings and/or cleaning materials, as applicable, containing volatile organic compounds (VOC~~'s~~) in order to substantiate the applicability of the claimed exemption. These records shall be maintained on site for three years and made available to the District upon request.

(1) The provisions of Sections (d), (e) and (f) shall not apply to the following:

(i) Any coating operation where 20 gallons or less of coatings are applied per consecutive 12-month period.

(ii) Any powder coating operation which uses less than 0.5 gallons per day of any surface preparation or cleaning material containing volatile organic compounds.

(iii) Coatings applied to motor vehicles, excluding the application of coatings to component parts or accessories during original manufacture.

(iv) Coatings applied using non-refillable handheld aerosol spray containers.

(v) Coatings applied to metal surfaces for the specific purpose of protecting the metal substrate from corrosive attack by storage battery electrolytes.

(vi) The application of the following coatings:

(A) Cathode coatings.

(B) Chemical milling maskants.

(C) Magnetic tape storage disks coatings.

(D) Safety indicating coatings.

(E) Solid film lubricants.

(F) Stencil coatings.

(G) Wet fastener installation coatings.

(2) The provisions of Subsection (d)(1) shall not apply to the following:

(i) Any coating operation which applies one gallon or less of coatings during each day of operation.

(ii) Any coatings that are applied by the use of air brushes with a coating capacity of two ounces (59.1 ml) or less.

(iii) Any coatings that are applied for touch-up operations.

(3) The provisions of Subsections (d)(2) and (d)(3) shall not apply to the following:

(i) Pretreatment wash primers with a VOC content, as applied, of less than 780 grams of VOC per liter of coating, less water and exempt compounds, provided that not more than 500 gallons of all pretreatment wash primers are used at a stationary source in each consecutive 12-month period.

(ii) High performance architectural coatings with a VOC content, as applied, of less than 750 grams of VOC per liter of coating, less water and exempt compounds, used at a stationary source which has continuously

maintained a District Permit to Operate for each high performance architectural coating operation since November 1, 1993.

(iii) Coatings with a VOC content, as applied, not to exceed 780 grams of VOC per liter of coating, less water and exempt compounds, used at a stationary source for specialty, custom-made signs or sign-related objects, including those fabricated either from metals or from the combination of metals with other substrates such as foam, wood, glass and/or plastics, where the coating of all substrates must match exactly in appearance and performance. Not more than an aggregate total of 20 gallons of all such coatings shall be used on metal parts at a stationary source in each consecutive 12-month period. In addition to the records required by this Section (b), any person claiming this exemption shall also maintain records describing the specialty, custom-made object or sign, the coating performance standard required, and the specifications to which the object or sign was produced.

(c) **DEFINITIONS** ~~(Rev. Effective 5/15/96)~~(Rev. *(date of adoption)*)

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

(1) **"Adhesive"** means a substance applied to a metal surface for the sole purpose of bonding the metal surface with another metal or non-metal surface by attachment.

(2) **"Air-Dried Coating"** means any coating which is not heated above 90° C (194° F) for the purpose of curing or drying.

(3) **"Baked Coating"** means any coating which is cured or dried in an oven where the oven air temperature exceeds 90° C (194° F).

(4) **"Cathode Coating"** means a functional coating applied to an electrical cathode.

(5) **"Chemical Agent Resistant Coating (CARC)"** means a coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents and to conceal the equipment from detection.

(6) **"Chemical Milling Maskant"** means a coating applied directly to a metal part to protect surface areas during chemical milling, anodizing, aging, bonding, plating, etching, or other chemical surface operations.

(7) **"Coating"** means a material containing more than 20 grams per liter of VOC as applied, less water and exempt compounds, which can be applied as a thin layer to a substrate, and which dries or cures to form a continuous solid film, including but not limited to any paint, primer, varnish, stain, lacquer, enamel, shellac, sealant, or maskant, and excluding any adhesives, or preservative oils.

(8) **"Coating Operation"** means all steps involved in the application, drying and/or curing of surface coatings, including touch-up operations, and associated surface preparation and equipment cleaning.

(9) **"Dip Coat"** means a coating application method accomplished by dipping an object into coating.

(10) **"Electrostatic Spray"** means a coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.

(11) **"Exempt Compound"** means the same as defined in Rule 2. ~~(Rev. Effective 5/15/96)~~

(12) **"Flow Coat"** means a coating application method accomplished by flowing a stream of coating over an object.

(13) **"Hand Application Method"** means a coating application method accomplished by applying a coating by manually held, non-mechanically operated equipment. Such equipment includes paintbrushes, hand rollers, rags and sponges.

(14) **"Heat-Resistant Coating"** means any coating which during normal use must withstand a temperature of at least 204.4° C (400° F).

(15) **"High Gloss Coating"** means any coating which achieves at least 75% reflectance on a 60° meter.

(16) **"High Performance Architectural Coating"** means a coating used to protect architectural subsections which meets the specifications of the Architectural Aluminum Manufacturers Association publication AAMA 605.2-1992.

(17) **"High-Volume Low-Pressure (HVLP) Spray"** means a coating application method which uses pressurized air at a permanent pressure between 0.1 and 10.0 psig, not to exceed 10 psig, measured at the air cap of the coating application system.

(18) **"Magnetic Tape Storage Disk Coating"** means a coating used on a metal disk which stores data magnetically.

(19) **"Metallic Topcoat"** means a coating which contains more than 5 grams of elemental metal particles per liter of coating, as applied.

(20) **"Motor Vehicle"** has the same meaning as defined in Section 415 of the Vehicle Code.

(21) **"Powder Coating"** means any material applied as a dry (without a carrier) finely divided solid which, when melted and fused, adheres to the substrate as a paint film.

(22) **"Preservative Oils"** means any material which does not contain solids, and is applied to prevent corrosion or provide lubrication or both.

(23) **"Pretreatment Wash Primer"** means any coating which contains a minimum of 0.5 percent acid by weight and which is applied directly to bare metal surfaces and is necessary to provide surface etching and required adhesion for subsequent coatings.

(24) **"Primer"** means a coating applied for purposes of corrosion prevention, protection from the environment, functional fluid resistance and/or adhesion of subsequent coatings. A primer would also include a coating which is formulated to be used as a primer but which, in a specific application, is used as an initial and final coating without subsequent application of a topcoat.

(25) **"Roll Coat"** means a coating application method accomplished by rolling a coating onto a flat surface using a roll applicator.

(26) **"Safety Indicating Coating"** means a coating applied to pressurized air cylinders which undergoes a wide color change when exposed to a high temperature.

(27) **"Solar Absorbent Coating"** means a coating formulated for the sole purpose of absorbing solar radiation to produce heat.

(28) **"Solid Film Lubricant"** means a thin film coating of an organic binder system containing as its chief pigment material one or more of the following: molybdenum disulfide, graphite, polytetrafluoroethylene or other solids that act as a dry lubricant between meeting surfaces.

(29) **"Stationary Source"** has the same meaning as defined in Rule 20.1.

(30) **"Stencil Coating"** means any ink or coating which is rolled, brushed or applied by air brush or non-refillable handheld aerosol spray containers onto a template or stamp in order to add identifying letters and/or numbers to metal parts and products.

(31) **"Touch-up Operation"** means that portion of the coating operation which is incidental to the main coating process but necessary to cover minor imperfections or minor mechanical damage incurred prior to intended use, or to achieve coverage as required.

(32) **"Transfer Efficiency"** means the ratio of the weight of coating solids adhering to the part being coated to the weight of coating solids used in the application process expressed as a percentage.

(33) **"Volatile Organic Compounds (VOC)"** means any volatile compound of carbon, which may be emitted to the atmosphere during operations or activities subject to this rule, except methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, ammonium carbonate, and exempt compounds.

(34) **"VOC Content Per Volume of Coating, Less Water and Exempt Compounds"** means the same as defined in Rule 2 and calculated as specified in Subsection (b)(51) of that rule.

~~weight of VOC per combined volume of VOC and coating solids and is calculated by the following equation:~~

~~$C_c voc = (W_s - W_w - W_{es}) / (V_m - V_w - V_{es})$~~

~~where:~~

~~$C_c voc$ = VOC content less water and exempt compounds~~

~~W_s = weight of volatile compounds including water and exempt compounds~~

~~W_w = weight of water~~

~~W_{es} = weight of exempt compounds~~

~~V_m = volume of material including water and exempt compounds~~

~~V_w = volume of water~~

~~V_{es} = volume of exempt compounds~~

(35) **"VOC Content Per Volume of Material"** means the same as defined in Rule 2 and is calculated as specified in Subsection (b)(52) of that rule.

~~weight of VOC per volume of material and is calculated by the following equation:~~

~~$C_m voc = (W_s - W_w - W_{es}) / V_m$~~

~~where: $C_m voc$ = VOC content~~

~~W_s = weight of volatile compounds including water and exempt compounds~~

~~W_w = weight of water~~

~~W_{es} = weight of exempt compounds~~

~~V_m = volume of material including water and exempt compounds~~

(36) **"Wet Fastener Installation Coating"** means a primer or sealant applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured.

(d) **STANDARDS**

(1) Application Equipment

Except as provided in Subsection (b)(2), no coatings shall be applied unless one of the following application methods is used:

(i) Electrostatic spray application, or

(ii) Flow coat application, or

(iii) Dip coat application, or

(iv) High-volume low-pressure (HVLP) spray application, or

(v) Roll coat, or

(vi) Hand application methods, or

(vii) Other coating application methods that are demonstrated to have a transfer efficiency at least equal to one of the above application methods, and which are used in such a manner that the parameters under which they were tested are permanent features of the method. Such coating application methods shall be approved in writing prior to use by the Air Pollution Control Officer.

(2) VOC Limits

Except as provided in Subsection (d)(3), a person shall not apply any coating with a VOC content in excess of the following limits expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

Air-Dried Coatings	340
Baked Coatings	275

(3) VOC Limits for Specialty Coatings

A person shall not apply any specialty coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter of coating, as applied, excluding water and exempt compounds:

CATEGORY	AIR-DRIED	BAKED
Chemical Agent Resistant	420	420
Heat Resistant	420	360
High Gloss	420	360
High Performance Architectural	420	420
Metallic Topcoat	420	360
Pretreatment Wash Primer	420	420
Solar Absorbent	420	360

The requirements of Subsections (d)(2) and (d)(3) may be met using an Alternative Emission Control Plan (AECP) that has been approved pursuant to Rule 67.1.

(4) Surface Preparation and Cleanup Solvents

Except as provided in Subsection (d)(5), a person shall not use VOC-containing materials for surface preparation or cleanup unless:

(i) The material contains 200 grams or less of VOC per liter of material; or

(ii) The material has an initial boiling point of 190° C (374° F) or greater; or

(iii) The material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F).

(5) Cleaning of Application Equipment

A person shall not use VOC containing materials for the cleaning of application equipment used in operations subject to this rule unless:

(i) The cleaning material contains 200 grams or less of VOC per liter of material; or

(ii) The cleaning material has an initial boiling point of 190° C (374° F) or greater; or

(iii) The cleaning material has a total VOC vapor pressure of 20 mm Hg or less, at 20° C (68° F); or

(iv) The cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or

(v) The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or

(vi) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or

(vii) Other application equipment cleaning methods that are demonstrated to be as effective as any of the equipment described above in minimizing the emissions of VOC to the atmosphere, provided that the device has been tested and approved prior to use by the Air Pollution Control Officer.

(6) No person shall require for use or specify the application of a coating subject to this rule if such use or application results in a violation of this rule. This prohibition shall apply to all written or oral contracts under the terms of which any coating is applied to any metal part or product at any location within San Diego County.

(7) Emission reduction credits that would otherwise be approvable pursuant to District Rule 26.0 et seq., shall not be granted for that portion of the emission reductions attributable to VOC contents of coatings which are subject to this rule, greater than 420 grams per liter or the applicable VOC content limit of this rule, whichever is less.

(e) **CONTROL EQUIPMENT**

(1) In lieu of complying with the provisions of Subsections (d)(2), (d)(3), (d)(4), and/or (d)(5) of this rule, a person may use an air pollution control system which:

(i) Has been installed in accordance with an Authority to Construct; and

(ii) Includes an emission collection system which captures organic gaseous emissions, including emissions associated with applicable coating, equipment cleaning, and surface preparation operations, and transports the captured emissions to an air pollution control device; and

(iii) Has a combined emissions capture and control device efficiency of at least 85 percent by weight.

(2) A person electing to use control equipment pursuant to Section (e)(1) shall submit to the Air Pollution Control Officer for approval an Operation and Maintenance plan for the proposed emission control device and emission collection system and receive approval prior to operation of the control equipment. Thereafter, the plan can be modified, with Air Pollution Control Officer approval, as necessary to ensure compliance. Such plan shall:

(i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with Subsection (e)(1)(iii), such as temperature, pressure, and/or flow rate; and

(ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding the key system operating parameters.

(3) Upon approval of the Air Pollution Control Officer, a person subject to the requirements of Section (e) shall implement the Operation and Maintenance plan and shall comply with the provisions of the approved plan thereafter.

(f) **RECORDKEEPING**

All records shall be retained on-site for at least three years, and shall be made available to the District upon request.

(1) Any person subject to the provisions of Subsections (d)(2), (d)(3), (d)(4) and/or (d)(5) of this rule shall maintain records in accordance with the following:

(i) Maintain a current list of coatings, surface preparation, and cleaning materials in use which provides all of the VOC data necessary to evaluate compliance, including but not limited to:

(A) manufacturer name and identification for each coating or coating component for multi-component coatings, (this includes any components such as bases, catalysts, thinners or reducers, when supplied in separate containers), surface preparation and cleaning material; and

(B) mix ratio of components; and

(C) VOC content, vapor pressure and/or initial boiling point, as applicable, for each coating, or coating component for multi-component coatings, surface preparation and cleaning material.

(ii) Maintain current documentation to demonstrate applicability of any specialty coating category pursuant to Subsection (d)(3) of this rule.

(iii) Maintain daily or monthly records of the amount of each coating or each coating component for multi-component coatings used. Maintain records of material additions to dip tanks used for dip coating applications.

(iv) Maintain daily or monthly records showing the amounts of each surface preparation and cleaning material used.

(v) Maintain records of the actual oven drying temperature, if applicable.

(2) Any person using control equipment pursuant to Section (e) of this rule shall:

(i) Maintain records in accordance with Subsection (f)(1); and

(ii) For all coating, cleaning, and/or surface preparation materials not in compliance with Subsections (d)(2), (d)(3), (d)(4), or (d)(5) of this rule, maintain daily records of the amount of each coating or each coating component for multi-component coatings, surface preparation and cleaning material used; and

(iii) Maintain daily records of key system operating parameters as approved in the Operation and Maintenance plan. Such records shall be sufficient to document continuous compliance with Subsection (e)(1)(iii) during periods of emission producing activities.

(g) **TEST METHODS**

(1) Measurement of heat resistance referenced in Subsection (c)(14) of this rule shall be conducted in accordance with ASTM Standard Test Method D2485-91.

(2) Measurement of coating reflectance referenced in Subsection (c)(15) of this rule shall be conducted in accordance with ASTM Standard Test Method D523-89.

(3) Measurement of elemental metal content referenced in Subsection (c)(19) of this rule shall be conducted and reported in accordance with the South Coast Air Quality Management District's Spectrographic Method 311.

(4) Measurement of pretreatment wash primer acid content referenced in Subsection (c)(23) of this rule shall be conducted in accordance with ASTM Standard Test Method D1613-91.

(5) Perfluorocarbon (PFC) compounds shall be assumed to be absent from a coating, cleaning, or surface preparation material subject to this rule unless a manufacturer of the material or a facility operator identifies the specific individual compound(s) and the amount(s) present in the material and provides an EPA and ARB approved test method which can be used to quantify the specific compounds.

(6) Measurements of transfer efficiency subject to Subsection (d)(1)(vii) of this rule shall be conducted in accordance with the South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" as it exists on November 1, 1994.

(7) Measurement of the VOC content of coatings, surface preparation and cleaning materials subject to Subsections (d)(2), (d)(3), (d)(4)(i) or (d)(5)(i) of this rule shall be conducted in accordance with EPA Test Method 24 (40 CFR 60, Appendix A) as it exists on November 1, 1994.

(8) Measurement of the VOC content of ultraviolet radiation-cured coatings subject to Subsections (d)(2) or (d)(3) of this rule shall be conducted in accordance with ASTM Standard Test Method D5403-93. Measurement of the water content and exempt solvent content, if applicable, shall be conducted and reported in accordance with ASTM Standard Test Methods D 3792-91 and D 4457-85.

(9) Measurement of the initial boiling point of cleaning and surface preparation materials subject to Subsection (d)(4)(ii) and/or (d)(5)(ii) of this rule shall be conducted in accordance with ASTM Standard Test Method D1078-86 for distillation range of volatile organic liquids.

(10) Calculation of total VOC vapor pressure for materials subject to Subsection (d)(4)(iii) and/or (d)(5)(iii) of this rule shall be conducted in accordance with the District's "Procedures for Estimating the Vapor Pressure of VOC Mixtures" as it exists on November 1, 1994. If the vapor pressure of the liquid mixture, as calculated by this procedure, exceeds the limits specified in Subsection (d)(4)(iii) and/or (d)(5)(iii), the vapor pressure shall be determined in accordance with ASTM Standard Test Method D2879-86, Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM Standard Test Methods D3792-91 and D4457-85 and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM Test Method D2879-86 shall be corrected for partial pressure of water and exempt compounds.

(11) Measurement of solvent losses from alternative application cleaning equipment subject to Subsection (d)(5)(vii) shall be conducted and reported in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" as it exists on November 1, 1994.

(12) Measurement of control device efficiency subject to Subsection (e)(1) of this rule shall be conducted in accordance with EPA Methods 18 and/or 25A (40 CFR 60) as they exist on November 1, 1994 and in accordance with a protocol approved by the Air Pollution Control Officer.

(13) Measurement of the emission collection system capture efficiency subject to Subsection (e)(1) of this rule shall be conducted using a protocol approved by the Air Pollution Control Officer. Subsequent to the initial compliance demonstration period, applicable key system operating parameters, as approved by the Air Pollution Control Officer, shall be used as indirect verification that capture efficiency has not diminished.

COMPARATIVE ANALYSIS FOR
RULE 67.3 - Metal Parts and Products Coating Operations

Pursuant to California Health and Safety Code Section 40727, the District is required to perform findings of necessity, authority, clarity, consistency, non-duplication, and reference prior to adopting, amending, or repealing a rule or regulation. As part of the consistency finding to ensure proposed rule requirements do not conflict with or contradict other 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 amended Rule 67.3 and existing federal rules, requirements, and guidelines applying to the same source category.

Current Rule 67.3 regulates volatile organic compound (VOC) emissions from metal parts and product operations. The proposed amendment to Rule 67.3 provides a small usage exemption for coatings applied to metal surfaces of specialty, custom-made objects, including signs fabricated either from metals or from the combination of metals with other substrates, where all coated substrates must match exactly in appearance and performance. A facility would be allowed to use up to 20 gallons of such coatings per year, provided the VOC content does not exceed 780 grams per liter, as applied, less water and less exempt compounds.

A comparison of amended Rule 67.3 with the Best Available Control Technology (BACT) - a requirement of the New Source Review regulations and the federal Control Technique Guideline (CTG) – Control of VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products is provided in Table 1. The VOC content limit comparison between the CTG and Rule 67.3 is provided in Table 2.

There are no conflicts or contradictions between the amended Rule 67.3 and the federal CTG or BACT requirements.

TABLE 1

DETAILED COMPARISON RULE 67.3 - METAL PARTS AND PRODUCTS COATING OPERATIONS

Items for Comparison	Amended Rule 67.3	San Diego Air Pollution Control District (SDAPCD) Best Available Control Technology (BACT)	Control Technique Guideline (CTG)* - Control of Volatile Organic Compounds (VOC) Emissions from Surface Coatings of Miscellaneous Metal Parts and Products
Applicability	All metal parts and products coating operations	Sources which emit > 10 lbs per day of VOC	All metal parts and products coating operations emitting ≥ 15 lbs per day of VOC**
Exemptions	**Exempt from the rule:** 1. Operations using 20 gallons/year of coatings or less 2. Powder coating operation using < 0.5 gal/day of VOC-containing surface preparation or cleaning materials 3. Coatings applied to motor vehicles, excluding those applied to component parts or accessories during original manufacture 4. Use of non-refillable, hand-held aerosol spray containers 5. Coatings applied to metal surfaces for protecting metal substrate from corrosive attack by storage battery electrolytes 6. Cathode coatings, chemical milling maskants, magnetic tape storage disk coatings, safety indicating coatings, solid film lubricants, stencil coatings, and wet fastener installation coatings	N/A	N/A
	Exempt from the application equipment standard 1. Use of one gallon of coatings or less per day 2. Air brushing and touch-up operations **Exempt from the emission standards:** 1. Pretreatment wash primers with the VOC content < 780 grams per liter (g/l), as applied, less water and exempt compounds, provided not more than 500 gallons per year of all pretreatment wash primers are used at a source 2. High performance architectural coatings with the VOC content less than 750 g/l, as applied, less water and exempt compounds, used at a source which has continuously maintained an Air Pollution Control District (District) Permit to Operate for each high performance architectural coating operation since November 1, 1993		

TABLE 1 Detailed Comparison Rule 67.3 - Metal Parts and Products Coating Operations - Continued

Items for Comparison	Amended Rule 67.3	SDAPCD BACT	CTG - Control of VOC Emissions from Surface Coatings of Miscellaneous Metal Parts and Products
Exemptions-continued	3. Coatings with VOC contents, not to exceed 780 g/l, as applied, less water and exempt compounds used at a source for specialty, custom-made objects provided not more than an aggregate total of 20 gallons/year of all such coatings are used		
VOC Content Standards	VOC content limit for various categories of coatings, surface preparation and cleanup materials (See Table 2 attached.)	For operations using < 10 gal of coatings per day - compliance with Rule 67.3	VOC content limits for various categories of coatings (See Table 2 attached.)
		For operations using ≥ 10 gal of coatings per day, a case-by-case determination of applicable add-on control device based on the District's cost-effectiveness guidance document	
Add-on Emission Control Requirements	Combined capture and control device efficiency of at least 85% by weight, as an alternative to complying with VOC content limits	Same as in Rule 67.3, a case-by-case determination of applicable add-on control device based on the District's cost-effectiveness guidance document	Control system that will achieve an equivalent reduction in emissions by complying with applicable VOC limits
Record-keeping	The following records are to be kept for three years: 1. Current list of coatings, surface preparation and cleaning materials used 2. Daily or monthly record of each coating, surface preparation and cleaning material used	Same as in Rule 67.3	Daily record of each coating and solvent used** (Consistent with compliance time frame.)
Test Methods	Various ASTM standard test methods and various test methods approved by the South Coast Air Quality Management District, EPA, or Air Resources Board; including VOC content, vapor pressure, boiling point and capture, and control and transfer efficiencies	Same as in Rule 67.3	EPA approved test methods adopted by reference EPA Test Method 24** EPA Test Method 25**

* Guideline Series, EPA-450/2-78-015, June 1978

** Based on EPA Publication "Issues relating to VOC Regulation Cutpoints, Deficiencies and Deviations" May 1988

TABLE 2

Volatile Organic Compound (VOC) Limits for Metal Parts and Product Coatings in Amended Rule 67.3 and the Environmental Protection Agency (EPA) Control Technique Guideline (CTG)

	Maximum Allowable VOC Content, grams/liter, less water and exempt compounds		
	CTG	**Rule 67.3**	
Coating Type	**Air-Dried and Baked Coatings**	**Air-Dried Coatings**	**Baked Coatings**
GENERAL COATINGS	360	340	275
SPECIALTY COATINGS			
Heat Resistant	420	420	360
High Gloss	420	420	360
Metallic Topcoat	420	420	360
Solar Absorbent	420	420	360
High Performance Architectural	420	750	N/A
Pretreatment Wash Primers	420	780	N/A
Other Exempt Coatings	420	780*	N/A

* Amended Rule 67.3 provides additional limited exemption for coatings used for specialty, custom-made signs with the VOC limit indicated above.

AIR POLLUTION CONTROL DISTRICT
SAN DIEGO COUNTY

PROPOSED AMENDED RULE 67.3 – METAL PARTS AND PRODUCTS COATING OPERATIONS

WORKSHOP REPORT

A notice for a workshop on the proposed Rule 67.3 amendments was mailed to all known permit holders, manufacturers, distributors, and retail sellers of metal parts and products coatings located in San Diego County. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties. The workshop was held at the San Diego Air Pollution Control District (District) on December 5, 2002. Comments were received from affected industry and ARB. The comments and District responses are as follows:

1. WORKSHOP COMMENT

It is not clear whether the District's Compliance Division would have any problems interpreting a proposed exemption in Subsection (b)(3) of the rule.

DISTRICT RESPONSE

The District's Compliance Division has been involved in the drafting of the amendments to Rule 67.3, and is satisfied that any issues involving interpretation of the proposed provision have been clarified.

2. WORKSHOP COMMENT

Is there a specific definition of "custom-made"?

DISTRICT RESPONSE

No. "Custom-made" is a common term that can be found in a dictionary. Such terms are typically not defined in District rules.

3. WRITTEN COMMENT - ARB

ARB has reviewed proposed amended Rule 67.3, and has no comments. The rule was examined by the Stationary Source and Enforcement Divisions, but not by the Monitoring and Laboratory Division.

DISTRICT RESPONSE

Since the amended Rule 67.3 does not involve any changes in Test Methods, no comments from ARB's Monitoring and Laboratory Division would be expected.

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01/15/03