



September 13, 2016

COMPLIANCE ADVISORY

ADOPTION OF NEW RULE 67.12.1 – POLYESTER RESIN OPERATIONS, AND REPEAL OF EXISTING RULE 67.12 – POLYESTER RESIN OPERATIONS

On May 11, 2016, the Air Pollution Control Board adopted new Rule 67.12.1 – Polyester Resin Operations. Rule 67.12.1 will reduce the volatile organic compounds (VOC) emitted from polyester resin materials used in the manufacture of products such as aerospace components, synthetic marble products, surfboards and boats. VOC emitted into the air contribute to the formation of ground level ozone, an air pollutant. Despite substantial air quality improvement over the past two decades, San Diego County has not yet attained state and federal air quality standards (limits) for ozone. Consequently, the Air Pollution Control District (District) is required by state and federal law to update its regulations as necessary to reflect the latest advances in technology to further reduce ozone-forming emissions. Rule 67.12.1 will help fulfill this requirement and can be viewed on the District's website at:

http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Prohibitions/APCD_R67.12.1.pdf.

Rule 67.12.1 will replace existing Rule 67.12, which was last updated in 1996 and is now outdated. Existing facilities will have a grace period until May 11, 2017, to use their existing inventories of conventional polyester resin materials and then transition to the new lower emitting materials required by Rule 67.12.1. Any new operations must comply with Rule 67.12.1 upon startup.

The new rule reflects the latest VOC emission control strategies applicable to monomers (a compound in resins and gel coats) and cleaning materials, and updates the record keeping requirements and test methods. More specifically, Rule 67.12.1 will:

- Specify several new resin and gel coat categories, and lower monomer limits for certain resin and gel coat categories.
- Specify a lower VOC weight loss limit for vapor suppressed resin materials.
- Require the use of surface preparation or solvent cleaning materials with a VOC content not more than 25 grams per liter.

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- Specify various application methods to be used and the requirements for cleaning the application equipment.
- Provide operating parameters and requirements for air pollution control equipment if it is used by a facility.
- Exempt from all rule requirements polyester resin operations using less than 20 gallons of polyester resin materials per month.
- Exempt from the controlled enclosure/controlled process requirements any equipment used for buffing, sanding, cutting, etc., under certain conditions.
- Update record keeping requirements.
- Provide additional definitions of major terms used in the rule.
- Update the test methods for determining compliance.
- Provide a compliance schedule for new and existing operations that are or may be subject to the new rule.

If you have any questions, please contact Eric Luther, District Business Assistant, at (858) 586-2656 or eric.luther@sdcounty.ca.gov.

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