

Ozone Rulemaking Surface Coatings

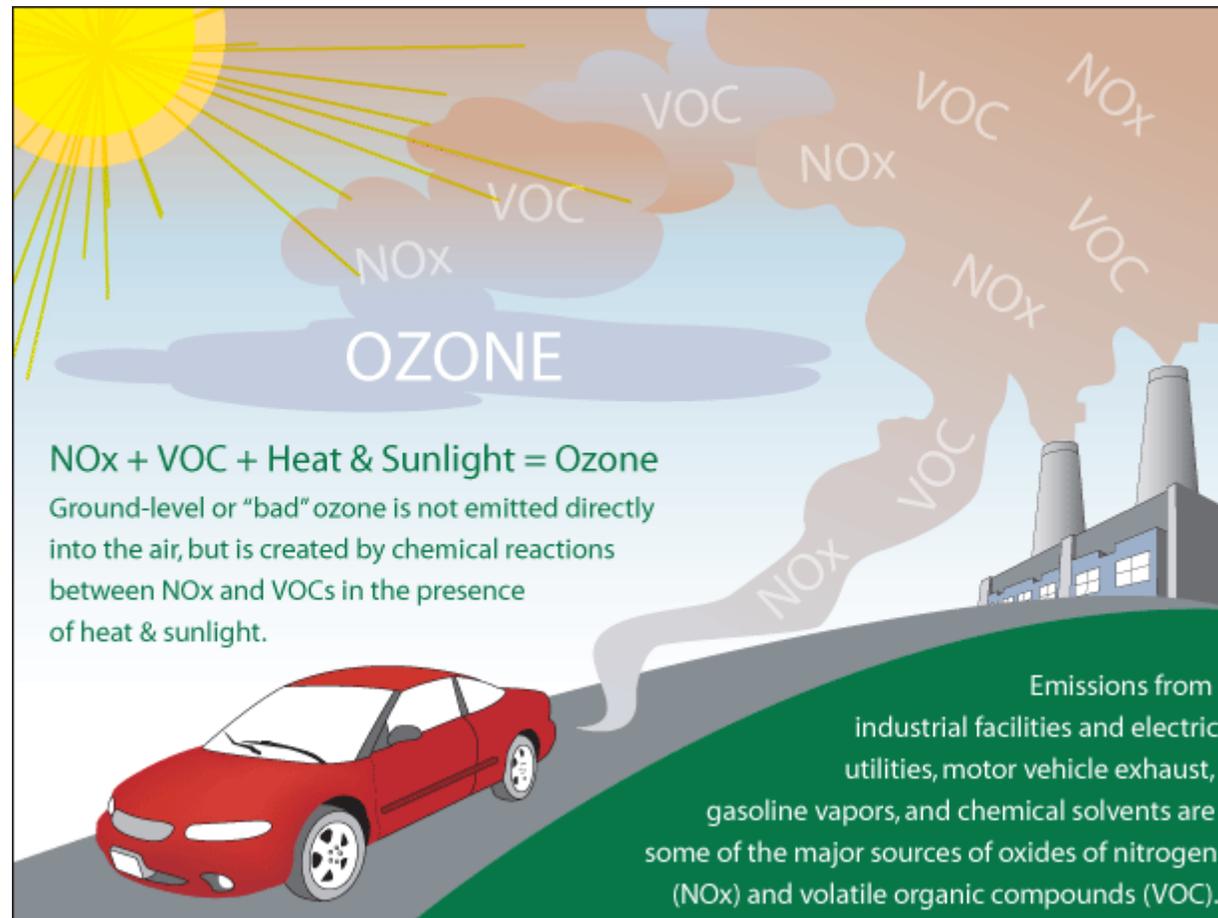
September 13, 2016

Why is the rulemaking necessary?

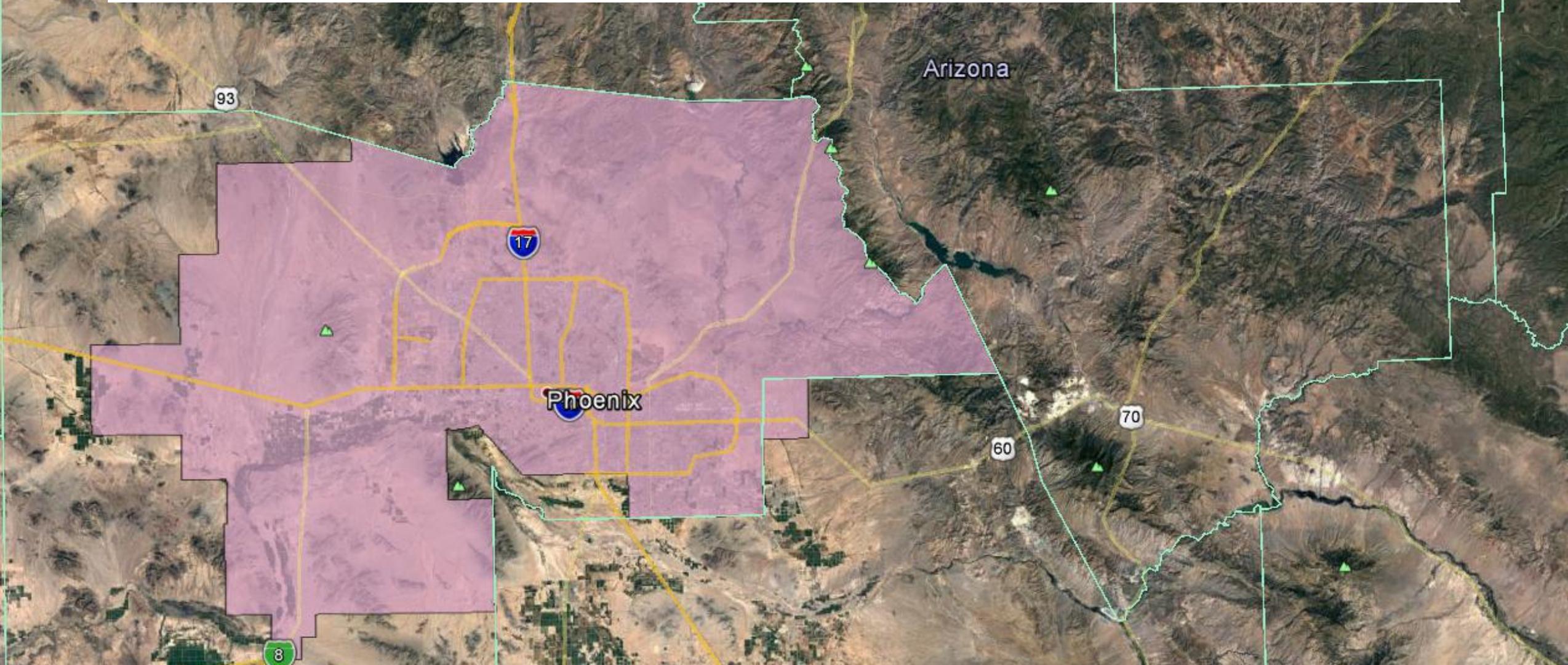
- Because Pinal County has a portion of the Phoenix-Mesa Ozone Nonattainment area, Originally designated nonattainment in 2004 for the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS).
- NAAQS are reviewed every 5 years and if deemed necessary by EPA Administrator, revised.
- Ozone NAAQS was revised in 2008 and again in 2015.
- Current rulemaking addresses the 2008 ozone NAAQS

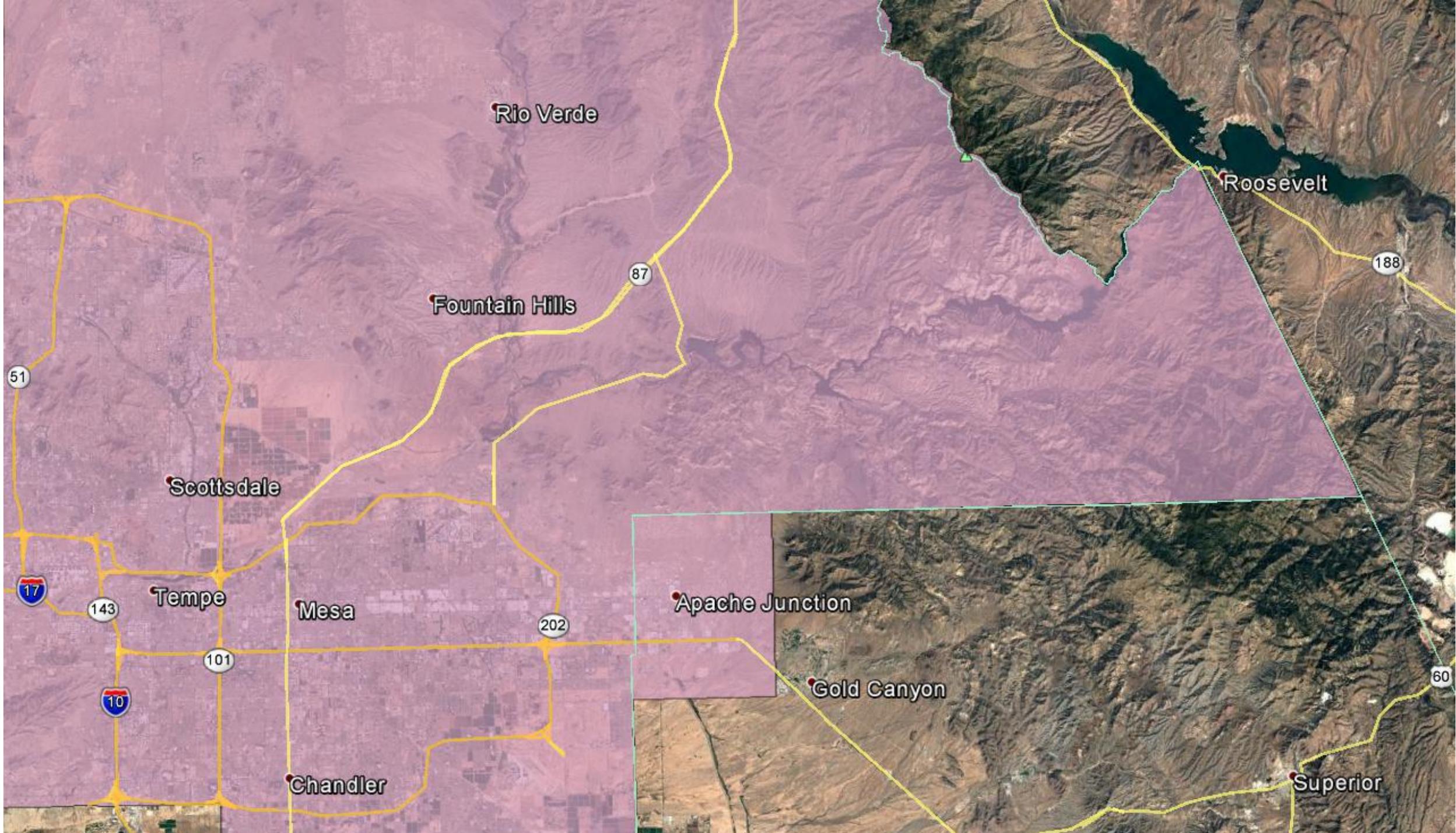
Ozone

- The pollutant ozone is a secondary pollutant (i.e. not directly emitted, formed during a chemical reaction in the atmosphere)



Phoenix-Mesa Ozone Nonattainment Area for 2008 Ozone NAAQS





Rio Verde

Roosevelt

Fountain Hills

Scottsdale

Tempe

Mesa

Apache Junction

Gold Canyon

Chandler

Superior

Why is the rulemaking necessary?

- Ozone Nonattainment area originally classified as marginal nonattainment
 - Less requirements (i.e. no State Implementation Plan (SIP))
- Attainment date was July 20, 2015
- Unfortunately area didn't attain by then
- EPA reclassified area moderate nonattainment
 - SIP required, including ozone Reasonably Available Control Technology (RACT) rules; Clean Air Act (CAA), Section 172(c)(1)
 - SIP required by January 1, 2017

Nomenclature

- What is RACT?
 - Reasonably Available Control Technology
 - The lowest emissions an industrial source is allowed to emit through the use of control technology that is reasonably available considering technological and economical feasibility.

Who has to use RACT?

- Any industrial source in an ozone nonattainment area that has a Control Techniques Guideline (CTG) [CAA 182(b)(2)(A)] and surpasses the emissions threshold in the CTG.
 - What's a CTG?!
 - EPA guidelines to assist State and Local air agencies with determining RACT

Who's Permitted?

- Pinal County Air Quality permits industrial sources that emit 1 ton per year or more (5.5 lbs/day)
- The department reviewed permitted sources and compared emissions with their respective CTG (if one exists)
 - If the emissions/throughput are over the CTG emissions threshold then a RACT rule is required
 - 2 source categories
 - Surface coating operations (2.7 tons per year of Volatile Organic Compound (VOC) emissions)
 - Gas stations (>10,000 gallons/month or 120,000 gallons/year)

Surface coatings proposed RACT rule

- Who does it pertain to?

- Surface coating operations in AJ ozone NAA that emit at least 15 lbs/day or emit at least 2.7 tons/year of VOCs.

- Exemptions

- Partial exemptions include leak-preventing materials (sealants, caulks, etc.) and certain joint fillers (caulking and beaded sealants)
- Extreme performance coatings exempt from the VOC limits in the rule but not other requirements in the rule
- Application methods exemptions
 - Metal part texture coatings
 - Metal part touch-up and repair coatings

Surface coatings proposed RACT rule

- Partial Exemptions (Cont.)
 - Application methods and VOC limit exemptions – The following sources only comply with the cleanup of application equipment, work practices-handling, disposal and storage of VOC-containing material
 - Aerosol can spray coating (non-refillable, less than 22 oz capacity, not to exceed 2 TPY)
 - Low usage VOC coatings – less than 55 gal/yr facility wide
 - Small surface coating source (less than 2 tpy VOC)
 - Coatings or solvents with VOC content less than 0.15 lb VOC/gal
 - Tactical military equipment with no suitable compliant substitute
 - Various metal parts coating (i.e. stencil, safety-indicator, magnetic data storage disk, etc.)

Surface coatings proposed RACT rule

- Partial Exemptions (Cont.)
 - Low usage allowance for restricted spray guns
- Total Categorical Exemptions – Solvent Cleaning (Chapter 5, Article 15)

Surface coatings proposed RACT rule

- Standards for
 - Surface coatings – Air dried and Baked coating limits for metal parts and products
 - Application methods – applicable to surface coating materials 2+ pounds of VOC per gallon, minus exempt compounds
 - Methods include High Volume Low Pressure (HVLP) spray-gun
 - Electrostatic system
 - Several other options including an option for alternative application method
 - Cleanup of application equipment
 - Spray-gun cleaning
 - Work-practices – handling, disposal and storage of VOC containing material
 - Emission Control System (ECS)

Surface coatings proposed RACT rule

- Administrative Requirements
 - Recordkeeping (i.e. Operation and Maintenance Plan) and notification requirements for use of ECS
 - Within 6 months of rule adoption - discontinue use of noncompliant surface coating materials purchased prior to the rule adoption
 - Operation & Maintenance Plans for ECS equipment subject to adopted rule needs to be revised/updated within 3 months of rule adoption. Control Officer has to take final action on the O & M plan within 30 days of submittal

Surface coatings proposed RACT rule

- Monitoring and Records
 - Required to keep records of the type and amount used of each VOC containing coating regulated by this rule and each VOC containing material related to surface coating
 - Maintain a current list of coatings or any other VOC containing materials regulated by this rule, including VOC content
 - Records to be retained for 5 years
 - ECS recording requirements
 - O & M plan records
 - Compliance determination and test methods

Rulemaking Timeline

- Oral Proceeding w/Control Officer (9/27/16), same location
 - 11 a.m. – Surface Coatings
 - 2 p.m. – Gas Stations
 - Public comment period closes at end of business on 9/27/16
- Public Hearing w/Board of Supervisors
 - Tentatively scheduled 11/30/16
 - After BOS adoption, Notice of Final Rulemaking published in Arizona Administrative Register (AAR)
 - State Implementation Plan (SIP) rulemaking packages delivered to ADEQ for submittal to EPA (December-January)
 - Rules going into effect locally when BOS adopts them, become federally enforceable when EPA approves them into the Arizona SIP

Questions and/or comments

Scott DiBiase, Pinal County Air Quality, (520)866-6929

Scott.dibiase@pinalcountyz.gov