

Ventura County Air Pollution Control District
FINAL STAFF REPORT – April 20, 2006

Revisions to RULE 74.30 WOOD PRODUCTS COATINGS

BACKGROUND

Rule 74.30, first adopted on 5/17/1994, implemented Control Measure R-306, Attachment A, of the 1991 Air Quality Management Plan (AQMP). The rule affected all manufacturers, suppliers, and contractors specifying or using wood products coatings in Ventura County by prohibiting the specification and use of noncompliant coatings for commercial operations.

On 9/10/1996, the rule was revised significantly to make the surface cleaning requirements in the rule consistent with revisions to Rule 74.6 adopted on 7/9/1996. Changes to Rule 74.30 included:

- 1) Standardization of vapor pressure calculations.
- 2) Standardization of low usage exemptions.
- 3) Standardization of spray gun washing requirements.

Other revisions corrected typographical errors, added definitions, removed past implementation dates and outdated standards, increased flexibility by allowing the use of emission control equipment in lieu of low-ROC wood coating strippers, and added an exemption for the coating of wooden musical instruments.

The 1996 revision also included significant revisions to the recordkeeping requirements in Section D. These changes addressed comments made by the

California Air Resources Board (ARB) and the U.S. Environmental Protection Agency (EPA).¹

On 11/3/2003, Rule 74.30 was revised again to make clerical corrections for consistency with concurrent revisions to Rule 74.6 and Rule 23.²

In this revision, ROC content limits for surface preparation and cleanup are reduced to those included in the November 7, 2003, revision to South Coast Air Quality Management District (SCAQMD) Rule 1171, *Solvent Cleaning Operations*. These limits appear in Table 1. The revisions are required because, under the provisions of Health and Safety Code section 40914(b)(2), staff is required to demonstrate that the District's plan to attain the California ambient ozone standard provides for expeditious implementation of "every feasible measure" to reduce ozone precursor emissions (including ROC). Also proposed is the deletion of obsolete language and the addition of clarifying language. A staff proposal to remove the exemption from ROC limits for wooden musical instrument manufacturers was found to be infeasible.

The proposed revision to Rule 74.30 is expected to result in a 0.83 ton per year ROC emission reduction in Ventura County among existing sources. The cost-effectiveness of ROC solvent revision is estimated at between \$365 and \$6,564 per ton of ROC reduced.

PROPOSED REVISION

The proposed revisions to Rule 74.30 involve a reduction in ROC content for surface preparation and cleanup material. Currently, the effective date of the revisions is 90 days from the date of adoption of the proposed rule by the Air Pollution Control Board. The revisions are required because, under the provisions of Health and Safety Code section 40914(b)(2), staff is required to demonstrate that the District's plan to attain the California ambient ozone

standard provides for expeditious implementation of "every feasible measure" to reduce ozone precursor emissions. ROC is an ozone precursor pollutant.

In addition, staff revisions include the removal of obsolete language and the rewording of certain subsections for clarity. A revised definition of HVLP spray equipment is also included.

Applicable Sources

When Rule 74.30 was adopted in 1994, there were five manufacturers using wood products coatings in Ventura County. There were eight sources in operation in September, 1996, with only one retained from the 1994 list. In 2005, 23 facilities in Ventura County have a wood products coating operation, including a number of musical instrument manufacturers. Appendix A is a recent list of permitted facilities and includes the maximum actual emission rate for both surface preparation and cleaning solvent. Note that many sources use water or acetone, which are exempt compounds.

ROC Content Revision

To comply with the requirements of H&S Code section 40914(b)(2), the following revisions are proposed:

1. Limit surface preparation material to 25 grams of ROC per liter of material.
2. Limit application equipment cleaning material to 25 grams of ROC per liter of material.

The proposed ROC content limits appear in the November 7, 2003, revision to SCAQMD Rule 1171, *Solvent Cleaning Operations*. The limit for surface preparation material and general cleanup material went into effect on November 7, 2003. The limit for the cleaning of coatings or adhesives on application equipment went into effect on July 1, 2005. The relevant Rule 1171 requirements appear in Table 1.

The proposed revisions to Section B, Requirements, appear below. Note that the effective date of the revisions is 90 days after adoption by the Air Pollution Control Board. Existing provisions in the rule will remain in effect until 90 days after adoption.

B.5. Surface Preparation and Cleanup Solvent

- a. After (90 days from date of adoption), no person shall use a material for surface preparation that has an ROC content exceeding 25 grams per liter of material.
- a. On or before (90 days from date of adoption), no person shall use ROC-containing materials which have more than 200 grams of ROC per liter of material for surface preparation.

b. After (90 days from date of adoption), no person shall use a material for either spray equipment cleaning or cleanup that has an ROC content exceeding 25 grams per liter of material.

b. On or before (90 days from date of adoption), No no person shall use ROC-containing materials for spray equipment cleaning unless:

1) The system used:

a) Is an enclosed gun washer or "low emission spray gun cleaner" that has been approved in writing by the APCO and is properly used for cleaning; or

b) Has been demonstrated to the APCO to be as effective as the equipment described in the subparagraph above in minimizing the loss of the ROC-containing material to the atmosphere according the test method in Subsection E.4.

2) The ROC composite partial pressure of organic solvent used is less than 45 mm Hg at a temperature of 20°C.

c. On or before (90 days from date of adoption), No no person shall use ROC-containing materials for cleanup unless the ROC composite partial pressure of organic solvent used is less than 45 mm Hg at 20°C.

The proposed revisions will require all ROC material used for surface preparation and cleaning to meet a 25 grams per liter limit. Note that the requirement for a spray gun washer or equivalent in Subsection B.5.b will be eliminated 90 days after the date of adoption. This does not mean that a gun washer cannot be used; it means that the washer will be required to use cleaning material with an ROC content of less than 25 grams per liter. In fact, staff expects enclosed gun cleaners to remain in use. Many compliant cleaning materials contain acetone, a very volatile and highly evaporative solvent. Because of this, the continued use of enclosed or low emission gun cleaners will prevent costly solvent from evaporating.

Table 1
Relevant SCAQMD Requirements - Rule 1171 (11/7/2003)

<i>Rule 1171, Subsection (c)(1)</i>	CURRENT LIMITS*	Effective 7/1/2005
SOLVENT CLEANING ACTIVITY	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application		
(i) General	25 (0.21)	
(B) Repair and Maintenance Cleaning		
(i) General	25 (0.21)	
(C) Cleaning of Coatings or Adhesives Application Equipment	550 (4.6)	25 (0.21)

Also proposed for deletion is the general purpose cleanup requirement in Subsection B.5.c. All cleaning material requirements will revert to new Subsection B.5.b, which states that all cleanup material must contain no more than 25 g/l of ROC.

Staff Revisions

Proposed for deletion are a number of obsolete emission limits in Subsection B.1. These limits applied "on or after 7/1/1995" and have been superseded by limits effective on July 1, 1996. Also, Subsection B.4.h became obsolete on July 1, 2000, and will be deleted; this subsection required proper application equipment for sources using less than 20 gallons of compliant coating per month.

The definition of High Volume-Low Pressure (HVLP) spray equipment is being updated to be consistent with other District rules. The existing definition in Subsection G.16 will be replaced with the following:

16. "High Volume-Low Pressure (HVLP)":
Equipment used to apply coatings by means of a spray gun designed to be operated and operated between 0.1 and 10 pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns.

The identification of HVLP spray equipment in the field has been an issue for District inspection staff. To assist in this, staff proposes a paragraph in Section

E, Test Methods, to specify methods of identification that may be used, as follows:

6. High Volume-Low Pressure (HVLP)
equipment shall be identified by either test air cap measurements or an inlet pressure measurement that, when used with specifications published by the manufacturer, establishes that gun is being operated as specified in Subsection G.16.

Subsection C.3 is being rewritten to clarify applicability of the exemption:

3. This rule shall not apply to the coating of permanently installed building appurtenances such as cabinets, shutters, fences and handrails, except new appurtenances upon initial coated at the site of permanent installation.

Typically, the coating of wooden cabinets, shutters, fences and handrails is done in a shop or manufacturing facility, where Rule 74.30 applies. The proposed revision clarifies that, if equipment of this type is coated in the field ("at the site of permanent installation"), Rule 74.2 for Architectural Coatings applies in lieu of Rule 74.30.

Other minor wording revisions to clarify Subsections B.1 and B.2 are also proposed. Titles will be added to the test methods listed in Subsection E.2 under Test Methods (see pages 9 and 10).

Musical Instrument Exemption

Staff considered removal of the exemption in Subsection C.4 from the requirements of Subsection B.1 and B.2 for wooden music instrument manufacturers. A similar exemption in SCAQMD Rule 1136 for "classic guitars" was vacated on July 1, 2005.

4. The limits in subsection B.1 and B.2 for Pigmented Coatings, Fillers, Washcoats, Sealers and Clear Topcoats shall not apply to the coating of wooden musical instruments.

Ventura County currently hosts four musical instrument manufacturers. Some materials currently used by these companies comply with the ROC limits. For other materials, each manufacturer contacted coating material suppliers in an attempt to find new materials that will both comply with the ROC limits in Subsections B.1 and B.2 and provide the surface coating quality required for the product. No new compliant materials were found. Based on this search, staff has determined that removal of the Subsection C.4 exemption is not feasible at this time.

EMISSION REDUCTION / COST EFFECTIVENESS

As noted in Appendix A, many existing permitted sources comply with Rule 74.30 using either water or acetone for cleanup and surface preparation. Acetone is non-reactive and is not considered an ROC. However, other sources use ROC material for spray equipment and general purpose cleanup. Therefore, the proposed revisions will result in a reduction in ROC emissions from cleaning and surface preparation operations.

Because emission reductions will occur, the cost-effectiveness and incremental cost-effectiveness of the revision is discussed below. Note that sources wishing to change their manufacturing process in response to future market conditions may be unable to comply with the rule. It is not possible to estimate either the nature or the cost of such a situation.

Emission Reductions

As shown in Appendix A, only nine of the 23 wood products facilities in Ventura County use a known quantity of solvent for surface preparation and cleaning. Two of these sources have permits pending. The remainder use either water or acetone in these functions.

Of the nine facilities using a known solvent, five supplement its use with either acetone or water. Based on actual solvent use rates, the ROC solvent emission rate from these sources is 0.86 tons per year. If it is possible to use either water or an exempt solvent at these facilities, the entire 0.86 tons per year can be eliminated. If solvents meeting the 25 gram/liter requirement are used, an ROC emission reduction of 0.83 tons per year is possible.

Cost-Effectiveness

As noted above, a number of wood products manufacturing facilities use a non-exempt cleanup solvent with a ROC content less than 200 grams per liter, as currently required. The facilities with known information appear in Table 2. An estimate of actual annual solvent use also appears in Table 2.

Table 2
Facilities Using ROC Solvent

Facility	Tons/Yr		
	Total	Reduced	Gal/Yr
2. Furn. Refinishing	0.059	0.056	30.00
4. Wood Cabinets	0.214	0.208	57.05
5. Wood Furniture	0.265	0.252	120.00
6. Musical Inst.	0.034	0.032	10.00
8. Musical Inst.	0.023	0.022	10.50
9. Furn. Refinishing	0.019	0.018	5.00
11. Furn. Refinishing	0.064	0.062	19.00
22. Indoor Shutters	0.148	0.143	40.00
23. Musical Inst.	<u>0.034</u>	<u>0.033</u>	<u>10.00</u>
	0.86	0.83	301.55

After examining wood products manufacturing operations in Ventura County, it appears that both acetone and water are popular substitutes for non-exempt ROC solvents. Both options have an ROC content of zero. It also appears that most ROC solvent is used for spray gun cleaning. With this in mind, staff has attempted to estimate the cost of switching from an ROC solvent to either acetone or two other popular exempt cleaning materials.

Staff has assumed that the ROC solvent currently in use is common lacquer thinner; local inquiries establish the cost of this solvent at \$12.00 per gallon. The cost of acetone is about \$14.00 per gallon, for a

cost differential of \$2.00 per gallon. As noted above, an ROC emission reduction of 0.86 tons per year can be assumed when an exempt solvent is used. Based on this information, and the amount of annual solvent use in Table 2, the following cost effectiveness is estimated.

$$(\$2/\text{gal}) * (301.55 \text{ gal/yr}) / (0.86 \text{ ton/yr}) = \$702 \text{ per ton of ROC reduced}$$

Staff has found a replacement solvent (PCL 2085B) that meets the 25 gram/liter requirement. If this material is used, an ROC emission reduction of 0.83 tons per year is possible. PCL states that the cost is about one dollar more than lacquer thinner³. The resulting cost effectiveness is:

$$(\$1/\text{gal}) * (301.55 \text{ gal/yr}) / (0.83 \text{ ton/yr}) = \$365 \text{ per ton of ROC reduced}$$

Another popular compliant solvent is PCBT (Parachlorobenzotrifluoride), commonly known as Oxsol 100, an exempt compound. The local cost of this material is about \$30 per gallon. Staff has no information on the usefulness of this material in wood products manufacturing. Nevertheless, the cost-effectiveness of the use of this material is:

$$(\$18/\text{gal}) * (301.55 \text{ gal/yr}) / (0.83 \text{ ton/yr}) = \$6,564 \text{ per ton of ROC reduced}$$

The District maintains a Best Available Control Technology (BACT) cost-effectiveness guideline of \$18,000 per ton of ROC reduced. All of the above estimates are well below this threshold. Therefore, the proposed revisions are reasonable based on the cost of control.

Incremental Cost-Effectiveness

Health and Safety Code Section 40920.6 requires the performance of an incremental cost-effectiveness analysis for a regulation that identifies more than one control option to meet the same emission reduction objectives. Incremental cost-effectiveness is defined as the difference in costs divided by the difference in emission reductions between one level of control and the next more stringent level of control.

Rule 74.30 regulates surface coatings and solvents used in the manufacture of wood products. Compliance by the substitution of materials is expected. No alternative emission control scenario is available.

SOCIOECONOMIC IMPACT

Health & Safety Code § 40728.5 requires the Air Pollution Control Board consider the socioeconomic impact of any new rule or amendment to an existing rule if air quality or emission limits are significantly affected. Because emission reductions will occur, the proposed revision to Rule 74.30 may have a significant effect on both air quality and emission limits.

The Board must evaluate the following socio-economic information on revised Rule 74.30:

- (1) *The type of industries or business, including small business, affected by the rule or regulation.*

Rule 74.30 affects all wood products manufacturing facilities in Ventura County. A list of these sources appears in Appendix A.

- (2) *The impact of the rule or regulation on employment and the economy of the region affected by the adoption of the rule or regulation.*

The adoption of revisions to Rule 74.30 is expected to have no impact on employment in and the economy of Ventura County. While the proposed rule may increase the cost of solvent in the wood products industry, this additional expense is expected to have no effect on either employment in or the economy of the region.

- (3) *The range of probable costs, including costs to industry or business, including small business, of the rule or regulation.*

The proposed rule may increase the cost of cleanup solvent by an estimated \$702 per year countywide if acetone is used. If the PCBT solvent Oxsol 100 is used, the increase in cost is estimated at about \$6,564 per year countywide.

- (4) *The availability and cost-effectiveness of alternatives to the rule or regulation being proposed or amended.*

The proposed revisions are required because, under the provisions of Health and Safety Code section 40914(b)(2), staff is required to demonstrate that the District's plan to attain the California ambient ozone standard provides for expeditious implementation of "every feasible measure" to reduce ozone precursor emissions (including ROC). As such, no alternatives are available for the proposed revisions.

(5) *The emission reduction potential of the rule or regulation.*

The estimated total ROC emission reduction for the proposed revisions to Rule 74.30 is a maximum of 0.86 tons per year.

(6) *The necessity of adopting, amending, or repealing the rule or regulation in order to attain state and federal ambient air standards pursuant to Chapter 10 (commencing with Section 40910).*

The proposed revisions to Rule 74.30 are required for expeditious implementation of "every feasible measure" to reduce ozone precursor emissions. The ROC emission reduction will assist in the District's progress towards attainment and maintenance of the federal and California ambient air quality standards. No additional credit for ROC emission reductions will appear in the AQMP as a result of the proposed revisions to Rule 74.30. The proposed revisions to Rule 74.30 do not appear in any AQMP control measure.

ENVIRONMENTAL IMPACTS OF METHODS OF COMPLIANCE / CEQA

Methods of Compliance

California Public Resources Code § 21159 requires the District to perform an environmental analysis of the reasonably foreseeable methods of compliance if the proposed rule requires "the installation of pollution control equipment, or [specifies] a performance standard or treatment requirement..." The proposed revisions to Rule 74.30 specify revised performance standards. Many existing sources comply with the proposed revisions by using either water or acetone for cleanup and surface preparation; this is the most reasonably foreseeable method of

compliance. No additional emission control equipment will be required.

CEQA Requirements

Staff concludes that adoption of the proposed revisions to Rule 74.30 is within the scope of the categorical exemptions from the California Environmental Quality Act (CEQA) under state CEQA guideline Sections 15307, Protection of Natural Resources, and 15308, Protection of Environment, and that no exceptions to these categorical exemptions apply.

ANALYSIS OF EXISTING FEDERAL AND DISTRICT REGULATIONS

California Health & Safety Code § 40727.2(a) requires districts to provide a written analysis of existing regulations prior to adopting, amending or repealing a regulation. Section 40727.2(a) states:

In complying with Section 40727, the district shall prepare a written analysis as required by this section. In the analysis, the district shall identify all existing federal air pollution control requirements, including, but not limited to, emission control standards constituting best available control technology for new or modified equipment, that apply to the same equipment or source type as the rule or

regulation proposed for adoption or modification by the district. The analysis shall also identify any of that district's existing or proposed rules and regulations that apply to the same equipment or source type, and all air pollution control requirements and guidelines that apply to the same equipment or source type and of which the district has been informed pursuant to subdivision (b).

District permit rules apply to wood products coating operations, including Rule 36, New Source Review – Hazardous Air Pollutants; see Appendix B for a list of applicable permit rules.

COMMENTS AND PUBLIC MEETINGS

Air Resources Board
January 19, 2006

1. *Sections B.6.c and B.6.d: These two sections require that the temperature of combustion gas or the exhaust gas be monitored.*

Section B.6.a requires that the capture and control system shall have a combined efficiency of at least 90 percent, by weight.

It is reasonable that the needed exhaust or combustion gas temperature will vary by the makers of the capture and control system unit for achieving the 90 percent by weight. However, this temperature will be known only by the manufacturer of the unit. The temperature should be monitored and maintained to achieve the required efficiency. This additional requirement will make the permit writer and the inspector's job easier because the rule requires the unit be operated to achieve a temperature to attain 90 percent efficiency.

To improve the enforceability of this rule, we recommend that a phrase be added to Sections B.6.c and B.6.d requiring the unit to be run at a minimum temperature to achieve the 90 percent efficiency by weight.

When drafting a Permit to Operate for an oxidizer, the District Engineering Division requires a minimum temperature as a surrogate parameter to assure compliance with the minimum destruction efficiency requirement. This minimum temperature requirement is established with the initial source testing of the oxidizer and is then made a condition of the Permit to Operate. Inspectors take a copy of the Permit to Operate to each inspection and evaluate each permit condition for compliance. The existing requirement to continuously monitor combustion temperature is adequate to assure compliance.

2. *Sections D.3 and D.4: These sections contain requirements for record keeping.*

The operator is required to maintain records on a daily or monthly basis, but is not required to sign and date the daily or monthly logs. A signature and a date would attest to records authenticity. An inspector would not know that accuracy of the records without an operator's

signature attesting to the authenticity of the records.

To improve the enforceability of this rule, we recommend that Rule 74.30 requires that the operator sign and date the daily or monthly logs.

Records are turned over to district inspectors annually by the person in responsible charge of the facility, who authenticates the information. We believe that sufficient data authenticity already exists and that additional signatures and dates are not necessary.

3. *Section D.5: This section contains a requirement for the retention of records for two years. Retention of records for two years is inadequate due to resource demands on the District. It may be over two years before an inspection of records can be performed because of resource demands on the District. Title V sources are required record retention of five years.*

To improve enforceability, we recommend that records are required to be kept for five year.

Records are turned over to district inspectors annually by the person in responsible charge of the facility. Additional record retention is not necessary. In addition, VCAPCD Rule 24, Source Recordkeeping, Reporting and Emission Statements, specifies in Sections A and B that "records shall be retained for at least two years."

4. *Section E.1: This section references EPA and ARB test methods without defining who they are or a citation for the test methods.*

To improve clarity, we recommend that acronym EPA and ARB be spelled out on first use along with the full citation of the test methods.

Staff considers the applicability of source test methods from EPA and ARB to be common knowledge; extended citation is not necessary. A source test protocol is either required or recommended for all sources, where specific test methods and procedures are reviewed and approved in advance. We believe the source test method citations in Subsection E.1 are adequate.

United States EPA
January 25, 2006

Please revise the test methods section of the rule regarding how to determine capture and control efficiency. In addition to citing USEPA's 1995 "Guidelines for Determining Capture Efficiency", the rule should also include the following references: (1) for determining capture efficiency, 40 CFR 51, Appendix M, Methods 204-204F; and, (2) for determining destruction efficiency, 40 CFR 60, Appendix A, Methods 18, 25, or 25A. Our "Guidance Document for Correcting Common VOC and Other Rule Deficiencies," August 21, 2001, contains sample rule language concerning these rule provisions and is available at the Region 9 website.

We agree with this comment. We propose to strike existing Subsection E.5 and replace it with the following:

5. Capture efficiency shall be determined according to EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995, and 40 CFR 51, Appendix M, Methods 204-204F as applicable. Control system efficiency shall be determined by 40 CFR 60, Appendix A, Methods 18, 25 or 25A.

Public Workshop
January 26, 2006

Workshop discussion centered on the proposal to delete the musical equipment manufacturers exemption (Subsection C.4). A guitar manufacturer stated that complying pigmented coatings, washcoats and sealers are not available. It is difficult to find coatings that will adhere to exotic woods. Another manufacturer is also unable to find complying pigmented coatings. Water based coatings don't work well and the ROC content is not always lower than the coatings currently used. A business development representative emphasized Oxnard's support for the four musical instrument manufacturers. There is concern that removal of the exemption will displace these companies. The musical instrument manufacturers were asked for information on the non-complying compounds currently in use and the companies consulted about alternative coatings.

The operator of a furniture coating operation indicated that acetone should work as a cleaning material in their coating operation. The guitar manufacturer stated that acetone may not work well for their gun cleaning needs.

Advisory Committee
March 28, 2006

Advisory Committee discussion centered on cost, availability and hazardous characteristics of replacement solvents. Discussion occurred on the possibility that operators may be required to use additional compliant solvent to accomplish the same goals. Discussion also occurred on the availability of and the emission control requirements for non-complying solvents sold for private use. The Advisory Committee recommended adoption of the proposed revisions to Rule 74.30.

Air Resources Board
March 29, 2006

1. *Sections B.6.c and B.6.d: These two sections require that the temperature of combustion gas or the exhaust gas be monitored.*

The written response to the ARB staff comments stated that an initial source test will be required to determine the operating temperature to achieve the 90 percent control efficiency. However, the rule does not require an initial source test.

To improve the enforceability of this rule, we recommend that a phrase be added to these sections requiring that an initial source test be performed to determine the minimum temperature for achieving the 90 percent efficiency by weight.

VCAPCD Rule 10, Subsection A.3.b, states the following (emphasis added):

3. Contents of an Authority to Construct

The APCO shall list the following information and restrictions in an Authority to Construct:

- b. **Any reasonable conditions determined by the APCO pursuant to Rule 29 to be necessary to assure or demonstrate that the stationary source will operate in compliance with applicable federal, state and local rules and regulations.**
These conditions may include, but shall not be limited to, any applicable requirement(s) to perform source testing, apply for a Permit to Operate or obtain emission reduction credits.

VCAPCD Rule 15, Section C, states the following:

The Air Pollution Control Officer may deny a Permit to Operate if an applicant fails to submit sufficient information to enable the Air Pollution Control Officer to determine the compliance status of the source within 6 months of the initial submittal of the application.

These provisions present sufficient authority to require initial source testing where applicable.

2. *Sections D.3 and D.4: These sections contain requirements for record keeping. However, these sections do not require authenticity of the records.*

All records need to be authenticated, and we concur with the District that usually each daily or monthly record does not need to be signed and dated to show authenticity. A cover letter signed, dated and attesting to the authenticity of the records is significant to authenticate the records and hold the source liable for the data. ARB staff has seen where sources have submitted data without an authenticity cover letter. On at least one occasion, ARB staff has been given two years of historical data and found the ink was still wet.

To improve the enforceability of this rule, we recommend that a phrase be added to these sections requiring any submitted data be attached to a cover letter confirming the authenticity of the submitted data.

As previously stated, records are turned over to district inspectors annually by the person in responsible charge of the facility, who authenticates the information. We believe that sufficient data authenticity already exists and a cover letter is not necessary.

3. *Section D.5: This section contains a requirement for the retention of records for two years.*

We would like to commend the District for their effort in collecting annual reports from the sources. We agree that five years is not always good retention time. However, other district rules including the ARB Air Toxic Control Measure Dry Cleaning rule have used the phrase ‘All records shall be retained for at least two years or until the next district

inspection of the facility, whichever period is longer.’

To improve enforceability, we recommend that the record retention sentence be modified to include the phrase ‘All records shall be retained for at least two years or until the next district inspection of the facility, whichever period is longer.’

As previously stated, we inspect and collect records from all sources annually. Additional record retention is not necessary. In addition, VCAPCD Rule 24, Source Recordkeeping, Reporting and Emission Statements, specifies in Sections A and B that “records shall be retained for at least two years.” To extend the retention period as suggested would violate Rule 24.

4. *Section E.1: This section references EPA and ARB test methods without defining who they are or a citation for the test methods.*

The Acronyms EPA and ARB has been used in the past to be synonymous with the United States Environmental Protection Agency and the Air Resources Board, respectively. However, lately several other states, counties, and countries have started using these acronyms to refer to their environmental agencies. There are several states with state level EPAs (i.e., California, Illinois, and Ohio). A search on the web indicates that there also are English-speaking countries with environmental protection agencies. This also holds to a much lesser degree for the acronym ARB.

To improve clarity, we recommend that acronym EPA and ARB be spelled out on first use. We also recommend that the full citation of the test methods be added to this section. Possible citations for USEPA Method 24 and CARB Method 432 follow:

USEPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, <http://www.epa.gov/ttn/emc/methods/method24.html>

USEPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, 40 Code of Federal Regulations (CFR) Part 60, Appendix A.

CARB Method 432, Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings, <http://www.arb.ca.gov/testmeth/vol3/vol3.htm>

CARB Method 432, Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings, California Air Resources Board Stationary Source Test Method, Volume 3.

These citations assume that USEPA and CARB have been previously defined. The date was not entered which assumes the latest. If you want to limit the method to a specific version, include the date of adoption.

We propose to include method titles as noted above. Rather than amend each rule individually, we propose to add a global definition of "EPA" and "ARB" to Rule 2, Definitions, at a later date.

REFERENCES

1. Letter to the Air Pollution Control Board, Ventura County Air Pollution Control District, September 10, 1996
2. Letter to the Air Pollution Control Board, Ventura County Air Pollution Control District, November 11, 2003
3. Telephone conversation with Ruben Laguna, PCL, 800/752-1566, February 7, 2006

Appendix A
Ventura County Facilities
Subject to Rule 74.30, Wood Product Coating
Reactive Organic Compounds in Tons Per Year
(April 20, 2006)

Product Produced	Solvent Used	Total Solvent Emissions	Reduced Solvent Emissions	Total ROC Emissions
1 W.L. Rubottom Co.	Water/Acetone	0.000	0.000	17.30
2 American Refinishers	Solvent	0.059	0.056	0.92
3 CA Door & Window	Water only	0.000	0.000	1.15
4 Creative Woodworks	Solvent/acetone	0.214	0.208	0.92
5 ERG International	Solvent	0.265	0.252	1.97
6 Drum Workshop	Water/LVP Solvent	0.034	0.032	3.42
7 American Furn Restoration	Water	0.000	0.000	0.86
8 Tom Anderson Guitarworks	Acetone/Solvent	0.023	0.022	2.57
9 Dip 'N Strip	Solvent/Water	0.019	0.018	0.49
10 Radley Fine Furniture	Water	0.000	0.000	0.37
11 The Wood Reviver	Solvent/Water	0.064	0.062	1.43
12 Sevoy Antiques	Acetone	0.000	0.000	0.30
13 Zad Design & Mfg	Acetone	0.000	0.000	4.92
14 Excalibur USA	Acetone	0.000	0.000	4.99
15 Patina Old World Floors	Acetone	0.000	0.000	0.53
16 Jean Larrivee Guitars USA	Acetone	0.000	0.000	3.75
17 Buena Vista Shutters	Water/Acetone	0.000	0.000	4.83
18 John Hall Designs	Water/Acetone	0.000	0.000	0.58
19 Ace Floor Company	Water	0.000	0.000	2.88
20 Staples Construction (Pending)	Solvent/Acetone	?	?	1.39
21 Musselmans Furniture	Acetone	0.000	0.000	1.97
22 Shoreline Shutters (Pending)	Solvent	0.148	0.143	0.98
23 RKS Guitars (Pending)	Solvent	0.034	0.033	0.16
		0.860	0.826	58.68

* - Permit pending

Appendix B
Applicable Permit Rules
 (7/18/05)

Permit Rules	Latest Version
Rule 10 Permits Required	4/13/04
Rule 11 Definitions for Regulation II	6/13/95
Rule 12 Applications for Permits	6/13/95
Rule 13 Action on Applications for an Authority to Construct	6/13/95
Rule 14 Action on Applications for a Permit to Operate	6/13/95
Rule 15 Standards for Permit Issuance	6/13/95
Rule 15.1 Sampling and Testing Facilities	10/12/93
Rule 16 BACT Certification	6/13/95
Rule 19 Posting of Permits.....	5/23/72
Rule 20 Transfer of Permit.....	5/23/72
Rule 22 Appeals	11/14/00
Rule 23 Exemptions from Permit.....	10/12/04
Rule 24 Source Recordkeeping, Reporting and Emission Statements.....	9/15/92
Rule 26 New Source Review	10/22/91
Rule 26.1 New Source Review - Definitions	5/14/02
Rule 26.2 New Source Review - Requirements.....	5/14/02
Rule 26.3 New Source Review- Exemptions.....	5/14/02
Rule 26.4 New Source Review - Emission Banking.....	5/14/02
Rule 26.5 New Source Review - Community Bank.....	1/13/98
Rule 26.6 New Source Review - Calculations	5/14/02
Rule 26.7 New Source Review - Notification.....	12/22/92
Rule 26.8 New Source Review - Permit To Operate	10/22/91
Rule 26.9 New Source Review - Power Plants	10/22/91
Rule 26.10 New Source Review - Prevention of Significant Deterioration.....	1/13/98
Rule 26.11 New Source Review - ERC Evaluation At Time Of Use	5/14/02
Rule 27 Suspension of Permits	3/9/76
Rule 28 Revocation of Permits	7/18/72
Rule 29 Conditions on Permits	10/22/91
Rule 30 Permit Renewal	4/13/04
Rule 31 Public Disclosure of Data.....	11/22/77
Rule 32 Breakdown Conditions: Emergency Variances	2/20/79
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Rule 33 Part 70 Permits - General.....	10/12/93
Rule 33.1 Part 70 Permits - Definitions	4/10/01
Rule 33.2 Part 70 Permits - Application Contents	4/10/01
Rule 33.3 Part 70 Permits - Permit Content.....	4/10/01
Rule 33.4 Part 70 Permits - Operational Flexibility.....	4/10/01
Rule 33.5 Part 70 Permits - Timeframes for Applications, Review and Issuance	10/12/93
Rule 33.6 Part 70 Permits - Permit Term and Permit Reissuance	10/12/93
Rule 33.7 Part 70 Permits - Notification.....	4/10/01
Rule 33.8 Part 70 Permits - Reopening of Permits	10/12/93
Rule 33.9 Part 70 Permits - Compliance Provisions.....	4/10/01
Rule 33.10 Part 70 Permits - General Part 70 Permits.....	10/12/93
Rule 35 Elective Emission Limits.....	11/12/96
Rule 36 New Source Review – Hazardous Air Pollutants.....	10/6/98
Rule 76 Federally Enforceable Limits on Potential to Emit	4/10/96