

# PUBLIC WORKSHOP

JANUARY 4, 2023, 8:00 AM



**Proposed Amended Rule 219 - Equipment Not Requiring a Written Permit Pursuant to Regulation II**

**Proposed Amended Rule 222 - Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II**

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# Agenda

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- Background
- Proposed Amended Rule 219
- Proposed Amended Rule 222
- Preliminary CEQA and Socioeconomic Assessments
- Public Process
- Contact Information

# Background

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- South Coast AQMD's permitting program (Regulation II – Permits) specifies operation and compliance requirements for equipment, processes, and operations that emit air contaminants
- Permitting program implements requirements that are in:
  - Federal and state Clean Air Act
  - South Coast AQMD Air Quality Management Plan
  - South Coast AQMD rules and regulations
- If a permit is required, the owner or operator must submit:
  - Permit application and applicable fees for permit evaluation
  - Information necessary to calculate potential emissions

# Background – Rule 219 and Rule 222

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Rule 219 identifies equipment, processes, or operations that are exempt from permitting requirements typically due to low emissions

- Many exemptions are based on specified maximum thresholds (such as equipment size or emissions limits) or processing of specified materials
- Adopted on January 9, 1976 and amended 21 times

Rule 222 establishes a filing (or registration) program, as an alternative for permits, for emission sources that are estimated to have lower emissions

- The emission sources are exempt from permitting per Rule 219
- A Rule 222 filing application and fee are required
- Adopted on September 11, 1998 and amended 5 times

# Proposed Amended Rule 219

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# Proposed Changes

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Address U.S.  
EPA comments

Promote Use of  
Low-Emission  
Technologies

Address  
Stakeholder  
Requests

Address Rule  
Ambiguities

Administrative  
Changes

# U.S. EPA Comments - Background

- State Implementation Plan (SIP) is a collection of regulations used to implement, maintain, and enforce the National Ambient Air Quality Standards and to fulfill other requirements of the Clean Air Act
- South Coast AQMD is required to submit for SIP approval rules and regulations relevant to controlling the six criteria air pollutants:
  - Carbon monoxide, lead, nitrogen oxides, ozone, particulate matter, and sulfur dioxide
- South Coast AQMD rules are submitted to CARB and then to U.S. EPA for SIP approval
- Rule 219 last approved by U.S. EPA and submitted into the SIP in 1981

# U.S. EPA Preliminary Comments

- In 2021, U.S. EPA provided a preliminary review of Rule 219 and identified items that would need to be addressed to facilitate SIP approval of the rule:
  - Equipment replacements at federal major sources
  - Inadequate recordkeeping requirements
  - Removal of Rule 222 requirements in Rule 219
- U.S. EPA also proposed edits throughout the rule to improve clarity, consistency, and enforceability



# Equipment Replacements at Federal Major Sources

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- Identical replacement of permitted equipment, in whole or in part, is exempt pursuant to Rule 219 (c)(3)
- U.S. EPA commented that equipment replacement at federal major sources\* cannot be exempt solely on the basis of being identical
  - Must meet the U.S. EPA standards for routine maintenance, repair, and replacement (RMRR)
  - Existing rule language does not clearly refer to RMRR standards
- PAR 219 addresses this comment by:
  - Clarifying existing provision only applies to non-federal major source facilities [PAR 219 (d)(3)(C)]
  - Adding a new provision to align with existing federal requirements and specifically exempt RMRR activities at federal major sources [PAR 219 (d)(3)(D)]

\* *Federal major source as defined in 40 CFR Part 70, Section 70.2*

# Inadequate Recordkeeping Requirements

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- Rule 219 contains exemption provisions based on equipment, size, material, operating or emission limitations
  - Rule 219 recordkeeping provisions refer to VOC recordkeeping requirements in South Coast AQMD Rule 109 - Recordkeeping for Volatile Organic Compound Emissions
- U.S. EPA commented that recordkeeping requirements should clearly and explicitly apply to all exemption provisions
- The Recordkeeping section [PAR 219 (f)] has been enhanced and clarified to require:
  - The maintenance of any documents needed to demonstrate ongoing exemption applicability
  - Documents to be maintained for 3 years and made available upon request
    - Consistent with recordkeeping requirements in recent rules

## Removal of Rule 222 Requirements in Rule 219

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- Several exemption provisions in Rule 219 require equipment to be registered in the Rule 222 filing program to qualify for the exemption
- U.S. EPA commented that the Rule 222 registration requirement is not necessary in Rule 219, as it is not a basis for determining whether equipment is exempt from permitting, and not required for SIP approval, so should be removed
- Rule 222 requirements still apply to the specific exempt equipment
  - PAR 219 includes language to indicate where Rule 222 requirements still apply
- The provisions of Rule 219 (s)(3) have been removed and incorporated into PAR 222
  - Rule 219 (s)(3) required Rule 222 registrations for specific exempt equipment, processes, and operations that emit four tons or more of VOCs per year

# Promote Use of Low-Emission Technologies

- During public hearings and committee meetings, stakeholders commented that manufacturing processes (e.g., printing or coating operations) using UV/EB/LED curing technology could result in reduction/elimination of VOC emissions
  - South Coast AQMD Governing Board has directed staff to evaluate Rule 219 to encourage the adoption of low-emission technologies
- PAR 219 includes new exemption provisions that provide existing operations relief from permitting requirements when adding low-emissions curing technologies
  - PAR 219 (d)(8)(H) and (d)(12)(L)



# Stakeholder Requests

- During the PAR 219 process, staff received multiple stakeholder requests to consider new exemption provisions to the rule
- Staff discussed the requests with stakeholders individually, as well as during the Working Group meetings
- All requests were evaluated, however most were not incorporated
  - Brief discussion on these requests is available in the Preliminary Draft Staff Report (Table 2-2)
- The request to exempt VOC-containing gas-insulated equipment was incorporated into PAR 219 subparagraph (d)(4)(M)

# Gas-Insulated Equipment (GIE)

- GIE include circuit breakers, gas-insulated substations, and other switchgear that are used by electric utilities for electrical power generation, transmission and distribution
  - A gas is used as an insulating medium, and kept in a sealed environment
- Beginning January 1, 2025, CARB requires the phase out of Sulfur Hexafluoride (SF6), a potent greenhouse gas, in GIE
  - SF6 is not regulated by South Coast AQMD
- Electric utilities are working to replace SF6 with alternative insulating mediums, including gases that may contain VOCs
- The utilities requested consideration to exempt VOC-containing GIE from permitting requirements due to limited VOC emission potential
  - Staff evaluation also concluded that VOC emission potential is low (up to 0.09 lbs/yr per GIE)
- PAR 219 includes a new exemption for GIE [PAR 219 (d)(4)(M)]



# Address Rule Ambiguities

- Proposed changes to address ambiguities in the existing rule language
- Modified existing exemption in subdivision (d)(6)(B) for manual abrasive blasting cabinets and the dust filters venting the cabinets
- Added new provisions to the Exceptions subdivision
  - Subdivision (e) – Exceptions establishes instances where otherwise exempt equipment, processes, and operations are required to obtain permits
  - Subparagraph (e)(2)(C) puts forth an exception for equipment not maintained or operated pursuant to exemption provisions or results in preventable excess emissions
  - Paragraph (e)(3) requires the submission of additional information, if there is inadequate information to determine health risk

## Abrasive Blasting Cabinets and Associated Dust Filters, subparagraph (d)(6)(B)

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- Abrasive blasting is the cleaning or preparation of a surface by forcibly propelling a stream of abrasive material against the surface
- Abrasive blasting cabinets control PM emissions by enclosing abrasive blasting operations and venting the air to dust filters
- Rule 219 (f)(2) exempts small manually operated abrasive blasting cabinets that are vented to dust filters, which are also exempt
- Proposed change in PAR 219 (d)(6)(B) adds a minimum overall control efficiency requirement for the dust filters in order to ensure proper emissions controls



# Exception For Equipment Not Maintained or Operated Properly – subparagraph (e)(2)(C)

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- Subparagraph (e)(2)(C) clarifies the instances where permit exemptions would not apply to equipment that is not maintained or operated properly
- Equipment may not qualify for a permit exemption if it is operated or modified in a manner that:
  - Is inconsistent with the applicable exemption provision; or
  - Leads to preventable excess emissions detected or observed by the Executive Officer
- The requirement for the Executive Officer to detect or observe preventable excess emissions addresses stakeholders' concerns that the term "excess emissions" may be applied too broadly

## Requirement to Submit Necessary Information to Determine Health Risk – paragraph (e)(3)

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- Pursuant to subparagraph (e)(2)(A), equipment, processes, or operations listed in Rule 219 are not exempt from permit requirements if the health risk from emissions is greater than identified in Rule 1401 – New Source Review of Toxic Air Contaminants
- When insufficient information is made available, the Executive Officer may not be able to determine whether equipment qualifies for a permit exemption
- Paragraph (e)(3) would clarify that if adequate information is not provided, additional information would be required

# Administrative Changes

- Minor edits made throughout PAR 219 to improve rule language clarity
  - Examples include placing non-referenced sentences into appropriate provisions, correcting inconsistent use of common phrases and revising sentence structures
  - Does not change any rule requirements
- PAR 219 has been reformatted to be consistent with other recently adopted or amended South Coast AQMD rules
  - Added Applicability and Definitions subdivisions and added a label to identify the “Purpose” text
  - Grouped each exempt equipment category into subdivision (d)
  - Consolidated existing test method requirements located throughout the rule into subdivision (g), Test Methods

# Administrative Changes – PAR 219 Structure

- (a) Purpose
- (b) Applicability
- (c) Definitions
- (d) Equipment, Processes, or Operations Not Requiring a Written Permit
  - (1) Mobile Equipment
  - (2) Combustion and Heat Transfer Equipment
  - (3) Structures and Equipment – General
  - (4) Utility Equipment – General
  - (5) Glass, Ceramic, Metallurgical Processing and Fabrication Equipment
  - (6) Abrasive Blasting Equipment
  - (7) Mechanical Equipment
  - (8) Printing and Reproduction Equipment
  - (9) Pharmaceuticals, Cosmetics and Food Processing and Preparation Equipment
  - (10) Plastics, Composite and Rubber Processing Equipment
  - (11) Mixing, Blending and Packaging Equipment
  - (12) Coating and Adhesive Process/Equipment
  - (13) Storage and Transfer Equipment
  - (14) Natural Gas and Crude Oil Production Equipment
  - (15) Cleaning
  - (16) Miscellaneous Process Equipment
  - (17) Agricultural Sources
  - (18) Registered Equipment
- (e) Exceptions
- (f) Recordkeeping
- (g) Test Methods
- (h) Compliance Dates

# Key Changes in PAR 219

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# Purpose and Applicability – Subdivisions (a) and (b)

- Labeled the Purpose section as subdivision (a)
- Consistent with more recent South Coast AQMD rules
- Updated to describe that permit-exempt equipment may still be required to be registered pursuant to Rule 222
- Added Applicability subdivision for consistency with other South Coast AQMD rules

## (a) Purpose

The purpose of this rule is to identify equipment, processes, or operations that emit small amounts of air contaminants that shall not require written permits, unless such equipment, process or operation is subject to subdivision (es) – Exceptions. Certain equipment, processes, or operations that do not require written permits may be subject to Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II.

## (b) Applicability

This rule applies to owners or operators of the equipment, processes, or operations listed in subdivision (d).

# Definitions – Subdivision (c)

- Added Definitions subdivision
  - Consistent with more recent South Coast AQMD rules
- Moved definitions from paragraph (d)(14) – Natural Gas and Crude Oil Production Equipment
- Added definitions for VOC content of regulated product and VOC content of material
  - Used in proposed Recordkeeping provision

- New VOC content definitions added:

- (2) GRAMS OF VOC PER LITER OF MATERIAL is the weight of VOC per volume of material and can be calculated by the following equation:

$$\text{Grams of VOC per Liter of Material} = \frac{W_s - W_w - W_{es}}{V_m}$$

Where:

$\frac{W_s}{}$	$\equiv$	<u>weight of volatile compounds, in grams</u>
$\frac{W_w}{}$	$\equiv$	<u>weight of water, in grams</u>
$\frac{W_{es}}{}$	$\equiv$	<u>weight of exempt compounds, in grams</u>
$\frac{V_m}{}$	$\equiv$	<u>volume of material, in liters</u>

- (3) GRAMS OF VOC PER LITER OF REGULATED PRODUCT, LESS WATER AND LESS EXEMPT COMPOUNDS is the weight of VOC per combined volume of VOC and product solids, and can be calculated by the following equation:

Grams of VOC per Liter of Regulated Product, Less Water and Less Exempt Compounds =  $\frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$

Where:

$\frac{W_s}{}$	$\equiv$	<u>weight of volatile compounds, in grams</u>
$\frac{W_w}{}$	$\equiv$	<u>weight of water, in grams</u>
$\frac{W_{es}}{}$	$\equiv$	<u>weight of exempt compounds, in grams</u>
$\frac{V_m}{}$	$\equiv$	<u>volume of material, in liters</u>
$\frac{V_w}{}$	$\equiv$	<u>volume of water, in liters</u>
$\frac{V_{es}}{}$	$\equiv$	<u>volume of exempt compounds, in liters</u>

# Equipment Replacement at Non-Major Sources and Major Sources – Subparagraphs (d)(3)(C) and (d)(3)(D)

- Modified subparagraph (d)(3)(C) to exempt identical equipment replacements at non-federal major sources only
- Created subparagraph (d)(3)(D), a separate provision to specify exemption for the routine maintenance, repair, or replacement of equipment at federal major sources

- (C) ~~Identical replacement in whole or in part of any equipment~~ Replacement of identical equipment, as defined in Rule 301 - Permitting and Associated Fees, at a facility that is not a federal major source, as defined in 40 CFR 51.165 or 52.21 as these regulations exist on [Date of Rule Amendment], where a permit to operate had previously been granted for such equipment under Rule 203, except seals for external or internal floating roof storage tanks.
- (D) Routine maintenance, repair or replacement of a part of any equipment at a facility that is a federal major source, as defined in 40 CFR 51.165 or 52.21 as these regulations exist on [Date of Rule Amendment], where a permit to operate had previously been issued for such equipment, based on U.S. EPA guidance in determining routine maintenance, repair, or replacement.



# GIE That Use VOC-Containing Insulating Gas – Subparagraph (d)(4)(M)

- Added new exemption provision for GIE using VOC-containing insulating gas
- Exemption applies to max voltage of 245 kV, as information necessary to evaluate emission potential is not available for larger voltage GIE

(M) Gas-insulated equipment with a voltage of 245 kilovolts or less, used in electrical power generation, transmission and distribution operations, that use a VOC-containing gas as an insulating medium and that is manufactured to have a maximum leak rate of less than one percent per year under normal operating conditions.

## Dust Filters for Manually Operated Abrasive Blasting Cabinets – Subparagraph (d)(6)(B)

- Added requirement for minimum 90 percent overall control efficiency for dust filters venting manually operated abrasive blasting cabinets
  - Ensures exempt abrasive blasting cabinets and associated dust filters effectively control PM
  - Clarification on existing exemption

(B) Manually operated abrasive blast cabinets, vented to a dust filter with at least 90 percent overall control efficiency (capture and collection efficiency) where the total internal volume of the blast section is 1.5 cubic meters (53 cubic feet) or less, and ~~any dust the dust filter exclusively~~ venting such equipment.

## Adding Curing/Drying Technologies to Existing Permitted Graphic Arts or Coating Operations – Subparagraphs (d)(8)(H) and (d)(12)(L)

- New provisions will exempt low-emission curing or drying equipment added to existing permitted operations provided the requirements in clauses (i) through (vi) are met
  - Added per Governing Board's direction to encourage the use of low-emission technologies
- Provisions of subparagraphs (d)(8)(H) and (d)(12)(L) are identical, but apply to their respective operations
  - See proposed (d)(12)(L) language on next slide

## Graphic Arts Equipment or Operations – (d)(8)(H)

- (H) The addition of UV/EB/LED curing technology, or other curing or drying technology, to an existing permitted graphics arts equipment or operation if:
- (i) The equipment remains consistent with the description in the existing Permit to Operate, excluding the addition of curing or drying equipment operated exclusively using electrical power;
  - (ii) The equipment complies with the conditions specified in the existing Permit to Operate;
  - (iii) There is no physical change to the configuration of the existing air pollution control equipment associated with the equipment or operation;
  - (iv) There is no physical change to the configuration of an existing permanent total enclosure associated with the equipment or operation;
  - (v) All inks, coatings, solvents, or other materials associated with the technology do not contain any toxic air contaminants pursuant to Rule 1401 – New Source Review of Toxic Air Contaminants, as listed on the Safety Data Sheet, except as allowed under the existing Permit to Operate; and
  - (vi) All inks, coatings and adhesives, fountain solutions, and VOC containing solvents associated with the technology (excluding cleanup solvents) contain 50 grams or less of VOC per liter of material and all cleanup solvents associated with the technology contain 25 grams or less of VOC per liter of material.

Adding Curing/Drying Technologies to Existing Permitted Graphic Arts or Coating Operations – Subparagraphs (d)(8)(H) and (d)(12)(L) *(continued)*

**Coating Equipment or Operations – (d)(12)(L)**

- (L) The addition of UV/EB/LED curing technology, or other curing or drying technology, to an existing permitted coating equipment or operation if:

  - (i) The equipment remains consistent with the description in the existing Permit to Operate, excluding the addition of curing or drying equipment operated exclusively using electrical power;
  - (ii) The equipment complies with the conditions specified in the existing Permit to Operate;
  - (iii) There is no physical change to the configuration of the existing air pollution control equipment associated with the equipment or operation;
  - (iv) There is no physical change to the configuration of an existing permanent total enclosure associated with the equipment or operation;
  - (v) All coatings, solvents, or other materials associated with the technology do not contain any toxic air contaminants pursuant to Rule 1401, as listed on the Safety Data Sheet, except as allowed under the existing Permit to Operate; and
  - (vi) All coatings, solvents, or other materials associated with the technology (excluding cleanup solvents) contain 50 grams or less of VOC per liter of material and all cleanup solvents associated with the technology contain 25 grams or less of VOC per liter of material.

## Remote Reservoir Cleaners – clause (d)(15)(A)(iii)

- U.S. EPA commented that a size limit for the remote reservoir cleaners exemption may be required for SIP-approval
  - Remote reservoir cleaners are currently exempt pursuant to Rule 219 (o)(1)(C)
- Proposed amendments add a maximum sink opening area threshold of 7 sq ft or less
  - Review of equipment available for purchase indicates this is inclusive of most remote reservoir cleaners
  - Staff does not anticipate that current owners or operators will be affected by the proposed amendment

(iii) ~~remote~~ Remote reservoir cleaners with a maximum sink opening area of seven square feet or less, provided the solvent from the sink-like area immediately drains into an enclosed solvent container while the parts are being cleaned.

# Updating Emissions Thresholds for Non-Title V Agricultural Sources – subparagraph (d)(17)(C)

- Table 1 in (d)(17)(C) lists annual emission thresholds for non-Title V agricultural sources
  - Thresholds required to be half of the Title V emission thresholds
- Title V thresholds were changed due to the reclassification of the Coachella Valley\* ozone nonattainment status—from Severe to Extreme nonattainment
- Table 1 also updated to include existing thresholds for PM2.5

**Table 1**  
**(Tons/Year)**

<b>Pollutant</b>	<b>South Coast Air Basin</b>	<b>Riverside County Portion of Salton Sea Air Basin</b>	<b>Riverside County Portion of Mojave Desert Air Basin</b>
VOC	5.0	<del>12.5</del> <u>5.0</u>	50.0
NOx	5.0	<del>12.5</del> <u>5.0</u>	50.0
SOx	35.0	35.0	50.0
CO	25.0	50.0	50.0
PM10	35.0	35.0	50.0
<u>PM2.5</u>	<u>35.0</u>	<u>50.0</u>	<u>50.0</u>
Single Hazardous Air Pollutant	5.0	5.0	5.0
Combination Hazardous Air Pollutants	12.5	12.5	12.5

\* Riverside County Portion of Salton Sea Air Basin

## Notification of PERP equipment used in the OCS – clause (d)(18)(B)(i)

- Pursuant to Rule 219 (r)(2), owners/operators of equipment registered under CARB's PERP program are currently required to submit a Rule 222 filing, which also serves to notify South Coast AQMD of when the equipment is used in the Outer Continental Shelf (OSC)
- With the removal of all Rule 222 filing requirements from PAR 219, owners/operators must notify by calling 1-800-CUT-SMOG

(i) ~~notification is submitted to the Executive Officer via submittal of a filing pursuant to Rule 222; The owner or operator notifies the Executive Officer by calling 1-800-CUT-SMOG;~~

## Removal of Rule 222 Filing Requirements – Multiple provisions in subdivision (d)

- Rule 222 filing requirements have been removed from PAR 219 due to U.S. EPA's recommendation
- Replaced with language that states Rule 222 may be applicable to the equipment
  - Indicates to the regulated community that the specified permit-exempt equipment may still be subject to Rule 222 requirements

## • Examples of proposed language:

### Subparagraph (d)(2)(E) – Exemption for portable diesel fueled heaters

- (E) Portable diesel fueled heaters, with a rated maximum heat input capacity of 250,000 Btu per hour or less, and that are equipped with burner(s) designed to fire exclusively on diesel fuel only ~~provided a filing pursuant to Rule 222 is submitted to the Executive Officer.~~ Rule 222 may be applicable.

### Subparagraph (d)(14)(B) - Exemption for oil and gas transfer pumps

- (B) Crude oil and natural gas pipeline transfer pumps, ~~provided a filing pursuant to Rule 222 is submitted to the Executive Officer for natural gas pipeline transfer pumps.~~ Rule 222 may be applicable to natural gas pipeline transfer pumps.



# Exception For Equipment Not Maintained or Operated Properly – subparagraph (e)(2)(C)

- Provision requires permits for otherwise-exempt equipment that is operated or maintained such that it:
  - Is inconsistent with the listed exemption, or
  - Results in preventable excess emissions that are detected or observed by the Executive Officer

- (C) The equipment or the air pollution control system venting the equipment has been modified, operated, or maintained in a manner that:
  - (i) Is inconsistent with the applicable exemption under any provisions of this rule; or
  - (ii) Results in otherwise preventable excess emissions that have been detected or observed by the Executive Officer.

## Requirement to Submit Necessary Information to Determine Health Risk – paragraph (e)(3)

- In instances where inadequate information is available to evaluate health risk, (e)(3) clarifies that the Executive Officer may request the necessary information
  - Information must be submitted via a permit application within 60 days of receiving a written notification

(3) If the Executive Officer determines the information to evaluate health risk is inadequate, or if additional information or review is required, upon written notification from the Executive Officer, the owner or operator shall, within 60 days of the written notification, submit (a) complete permit application(s) to demonstrate the equipment operates below the risk thresholds in subparagraph (e)(2)(A).

# Recordkeeping – Subdivision (f)

- The recordkeeping provision has been enhanced and clarified in response to U.S. EPA's comment
- Paragraph (f)(1) requires owners or operators claiming any exemption to maintain the necessary records to demonstrate that the exemption applies

## (f) Recordkeeping

(1) Any owner or operator claiming an exemption under any provision of this rule shall maintain documentation and/or calculations sufficient to demonstrate that the stated exemption provision, parameter, requirement or limitation applies. Documentation may include, as applicable, but not be limited to:

(A) VOC-containing material throughput and emissions;

(B) VOC content of each VOC-containing material, including:

(i) The Grams of VOC Per Liter of Regulated Product, Less Water and Exempt Compounds; and

(ii) The Grams of VOC Per Liter of Material, including water and exempt compounds;

(C) Hours of operation;

(D) Materials used or processed;

(E) Fuel type and usage;

(F) Throughput;

(G) Operating parameters;

(H) Manufacturer specifications;

(I) Rating plate; and

(J) Safety Data Sheets.

# Recordkeeping – Subdivision (f) *(continued)*

- Paragraph (f)(2) requires records to be maintained for three years and made available upon request

(2) All documentation and/or records pursuant to paragraph (f)(1) shall be maintained onsite for three years and made available to the Executive Officer upon request.

# Proposed Amended Rule 222

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# Proposed Amended Rule 222

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- Rule 222 is linked closely with Rule 219
  - Equipment that is required to be registered with Rule 222, as listed in Table I, are exempt from permit requirements, and are listed in Rule 219
  - Rule 222 must be updated to align with the proposed amendments in PAR 219
  - The proposed changes in PAR 222 would:

Accommodate  
Rule 219  
revisions

Update specific  
references to  
Rule 219  
provisions

Establish  
Subdivision (f) -  
Exemptions

Revise for clarity  
and consistency

# Accommodating Rule 219 Revisions

- Table I provisions allow specific printing, laminating, and drying equipment to submit a low-VOC verification in lieu of a Rule 222 registration
  - This has been removed from both Table I and PAR 219 in response to U.S. EPA's comment that a one-time submission is inconsistent with the requirement in PAR 219 to maintain ongoing records
- The Rule 222 registration requirements for specified exempt equipment emitting 4 tons per year of VOC or more, formerly in Rule 219 (s)(3), have been moved to PAR 222:
  - Applicable equipment is listed in new paragraph (b)(2)
  - Requirements that were listed in Rule 219 (s)(3) are moved to subdivision (d) – Requirements in PAR 222

## Updating Specific References to Rule 219 Provisions

- Rule 222 contains references to Rule 219 provisions, which have been relabeled due to the reformatting effort
- PAR 222 updates those references throughout the proposed rule
- Missing Rule 219 references were added to Table I



# Example of Updates to Table I

- Updated Rule 219 reference

- Accommodating a Rule 219 revision

EMISSION SOURCE	EFFECTIVE DATE
Roller to roller coating systems that create 3-dimensional images, exempt from a written permit pursuant to Rule 219 <u>(d)(10)(M)(iii)</u> <del>(j)(13)(C)</del> .	12/5/2008
Printing and related coating and/or laminating equipment and associated dryers and curing equipment exempt from a written permit pursuant to <u>Rule 219 (d)(8)(A)(ii)</u> <del>unless a low-VOG verification is submitted to the Executive Officer in accordance with Rule 219 (l)(6)(F)(ii)</del> .	5/5/2017

# Key Changes in PAR 222

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# Exempt Equipment Emitting 4 Tons Per Year Of VOC Or More

- Moved from Rule 219 (s)(3) provisions
- PAR 222 (b)(2) lists the applicable facilities and equipment

- (2) This rule applies to owners or operators of the following emission sources that are located at a single facility, which does not hold a written permit for any other emission sources and emits 4.0 tons or more of VOCs in any calendar year, or emitted 4.0 tons or more of VOCs in the Fiscal Year July 1, 2006 – June 30, 2007:
- (A) Printing operations individually exempted from written permits pursuant to Rule 219 (d)(8)(A) and (d)(8)(G);
- (B) Coating or adhesive application or laminating equipment and devices individually exempted from written permits pursuant to Rule 219 (d)(12)(F) and (d)(12)(J); and
- (C) Hand application of VOC-containing materials operations individually exempted from written permits pursuant to Rule 219 (d)(15)(D).

# Exempt Equipment Emitting 4 Tons Per Year Of VOC Or More *(continued)*

- Amendments to PAR 222 (d)(1)(C) incorporates the filing requirements from Rule 219 (s)(3)
- Addition of subparagraph (d)(1)(I) incorporates the AER reporting requirement from (s)(3)

(d)(1)(C) ....For an owner or operator of a emission source subject to paragraph (b)(2), a single, consolidated filing covering all of the categories of equipment, processes, or operations listed in subparagraphs (b)(2)(A) through (b)(2)(C) is required....

(d)(1)(I) For facilities subject to paragraph (b)(2), report associated VOC emissions from all of the categories of equipment, processes or operations listed in subparagraphs (b)(2)(A) through (b)(2)(C) under the Annual Emissions Reporting program, pursuant to Rule 301.

## Exemptions – Subdivision (f)

- Clarifies registration program does not apply to residential developments
- Consistent with South Coast AQMD permitting procedures

## Establish Subdivision (f) – Exemptions

- (f) The provisions of this rule shall not apply to emission sources utilized exclusively in connection with any structure that is designed for and used exclusively as a dwelling for not more than four families, and where such equipment is used by the owner or occupant of such a dwelling.

# Revisions for Clarity and Consistency

- Aligned entries in Table 1 with language in equipment definitions in subdivision (c)
- Consistent use of the term “emission source”
- Added language that clarifies the applicability of the compliance date in paragraph (e)(2)
- Grammatical edits

# California Environmental Quality Act (CEQA)

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- The South Coast AQMD, as lead agency, is reviewing the PAR 219 and PAR 222 project to determine if it will result in any potential adverse environmental impacts
- Appropriate CEQA documentation will be prepared based on the analysis

# Socioeconomic Impact Assessment

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- Health and Safety Code Sections 40440.8 and 40728.5
  - Requires socioeconomic impact assessment for proposed rule or rule amendment which “will significantly affect air quality or emissions limitations”
  - Socioeconomic impact assessment shall consider (to the extent data is available):
    1. Type of affected industries, including small businesses
    2. Impact on regional employment and economy
    3. Range of probable costs, including costs to industry or business
    4. Availability and cost-effectiveness of alternatives
    5. Emissions reduction potential
    6. Necessity of adopting, amending, or repealing the rule



# Public Process

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December 16, 2022 – Preliminary Draft Documents Released

January 4, 2023 – Public Workshop

January 20, 2023 – Stationary Source Committee

February 3, 2023 – Set Hearing

March 3, 2023 – Scheduled Public Hearing

# Submission of Comments or Documents

Written comments on PAR 219 and PAR 222 should be directed to Rule development staff and be submitted by:

**January 18, 2023**

To access additional documents for PAR 219 and PAR 222, please use the following link:

<http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-219-and-222>

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