

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

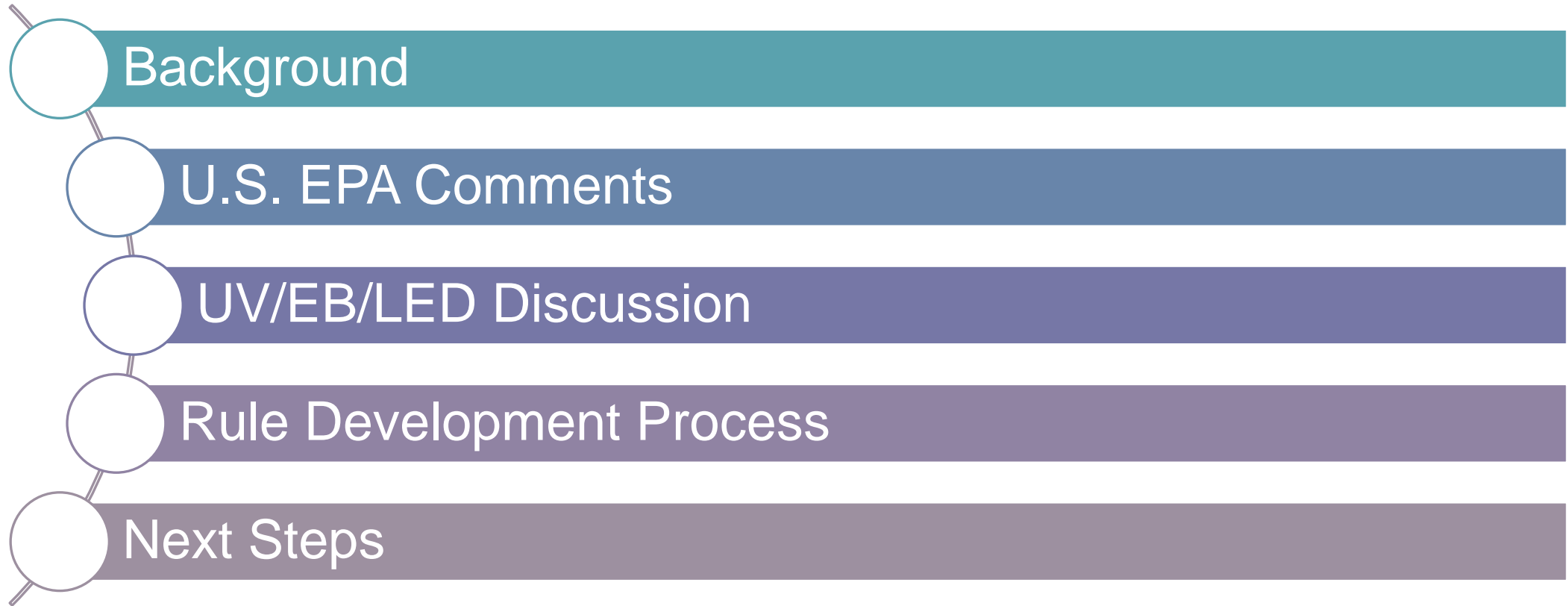
## WORKING GROUP MEETING #1

March 31, 2022  
10:00 AM (PST)  
South Coast AQMD  
Diamond Bar, CA

Join Zoom Webinar Meeting – from PC  
or Laptop  
<https://scaqmd.zoom.us/j/99609769623>  
Zoom Webinar ID: 996 0976 9623  
Teleconference Dial In: +1 669 900 6833

# Agenda

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# Background

- Rule 219
  - Identifies equipment, processes, or operations that do not require a permit due to low emissions
  - Equipment may need to be operated below certain thresholds
- Rule 219 is amended on a regular basis as technology evolves
- Amendments can address:

## New Technologies

- Industrial and commercial innovations that may emit less air pollutants

## Improved Understanding of Emission Sources

- Changes to emission profiles based on testing or updates to toxicity emission factors

## Clarifications

- Edits to make the rule more user-friendly

## South AQMD Permitting Rules

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### **Rule 203 – Permit to Operate**

Requires a permit to operate for equipment that either emits air pollution or controls air pollution

### **Rule 219 – Equipment not Requiring a Written Permit Pursuant to Regulation II**

Lists equipment and operations that would not require a permit to operate

### **Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II**

In lieu of a permit, equipment can be registered if the equipment is listed in Rule 222 and exempt per Rule 219

## State Implementation Plan

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- 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 rules are submitted to CARB and then ultimately to U.S. EPA for SIP approval
- Last version of Rule 219 approved into SIP was amended in 1981
- U.S. EPA has requested that latest version of Rule 219 be submitted for inclusion into the SIP

# U.S. EPA Comments

# U.S. EPA Comments

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- U.S. EPA provided preliminary comments for consideration prior to Rule 219 SIP-submittal
- South Coast AQMD is reviewing comments for the following topics:

Recordkeeping  
Requirements

Thresholds for  
Agricultural  
Sources

Rule 222  
References

Edits to Improve  
Clarity

## Recordkeeping and Exemption Demonstration Requirements

- Many Rule 219 exemptions are based on thresholds such as size, throughput, and operational and emission limits
- Facilities using exemptions for VOCs are required to maintain records per Rule 109 – Recordkeeping for Volatile Organic Compound Emissions
- U.S. EPA has inquired about ongoing compliance demonstrations
  - Commented that more recordkeeping requirements are needed to demonstrate Rule 219 thresholds are not being exceeded
- Staff is considering additional recordkeeping requirements for non-VOC exemptions



## Thresholds for Agricultural Sources

- Paragraph (q)(2) sets emissions thresholds for agricultural sources not subject to Title V requirements
  - Agricultural permit units at these agricultural sources are exempt if emissions at the sources are below the thresholds.
  - Thresholds must be based on 50% of major source thresholds in SIP approved rules or Title V thresholds, whichever are more stringent
- U.S. EPA has provided edits to update the emission thresholds

# Thresholds for Agricultural Sources

## Proposed Edits to Threshold Table in (q)(2)

Pollutant (Tons/Year)	South Coast Air Basin	Riverside County Portion of Salton Sea Air Basin	Riverside County Portion of Mojave Desert Air Basin
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>35.0</u>	<u>50.0</u>
Single HAP	5.0	5.0	5.0
Combination HAPs	12.5	12.5	12.5

- Staff will verify and update the emission thresholds

## Rule 222 References

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- In order to qualify for a Rule 219 permit exemption, some equipment is required to be registered with South Coast AQMD Rule 222
  - Rule 222 has not been submitted for SIP approval
- U.S. EPA recommends Rule 219 be a standalone regulation and not reference Rule 222
  - Would allow the registration program to be tailored to meet local needs
- Removing Rule 222 references in Rule 219 would require extensive changes to both rules
- Staff is discussing internally and with U.S. EPA

## Edits to Improve Clarity

- U.S. EPA suggested restructuring some provisions to improve readability
  - Separate out rule provisions that do not list exempt equipment from the other provisions:
    - Subdivision (s) – Exceptions
    - Subdivision (t) – Recordkeeping
    - Subdivision (u) – Compliance Date
- U.S. EPA suggested various minor edits to clarify language to:
  - Ensure consistent use of common phrases
  - Remove past compliance dates
  - Correct grammar
- Staff will review and make the appropriate edits ensuring there are no unintentional effects on rule requirements

# Next Steps

- Continue internal discussions
- Hold meetings with U.S. EPA staff to clarify requests
- Start drafting preliminary amended rule

# UV/EB/LED Discussion

# UV/EB/LED Overview

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- Ultraviolet, electron beam, or light-emitting diode (UV/EB/LED) curing uses UV energy, visible light, or low energy electrons to cure a coating, film, or ink (referred to as “materials”)
  - UV/EB/LED curing is used in a wide range of applications (e.g., graphic art inks, coatings on wood furniture, plastic, and automotive parts)
  - The materials are specially formulated for UV/EB/LED curing
  - Curing occurs much more quickly than conventional curing, possibly resulting in higher throughput
- UV/EB/LED materials must comply with VOC content limits in the appropriate source specific rules
- Notable emissions benefits of UV/EB/LED:
  - Materials may be formulated without VOCs or toxic air contaminants
  - No emissions from combustion since conventional furnace or oven is not required

# Permitting Background

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## All Facilities

Submit a permit application when installing or physically modifying non-exempt equipment or processes



## Permitting Staff

Conducts an analysis of the proposed project to determine:

- Permit applicability
- Emission calculations
- Rule compliance

- Current version of Rule 219 exempts UV/EB/LED-related processes and equipment from permitting if they operate under the specified limits
  - Intended to encourage use of low-emitting materials and technologies



# Previous UV/EB/LED Amendments

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Sept 1998 – Exempt low-VOC UV/EB coatings




Nov 2000 – Limit low-VOC UV/EB coating exemption to six gallons per day



May 2006 – Expanded UV/EB exemptions to graphic arts materials



July 2007 – Limited low-VOC exemption to equipment emitting less than 1 ton per year; lowered usage limits for solvent- and water-based UV/EB materials



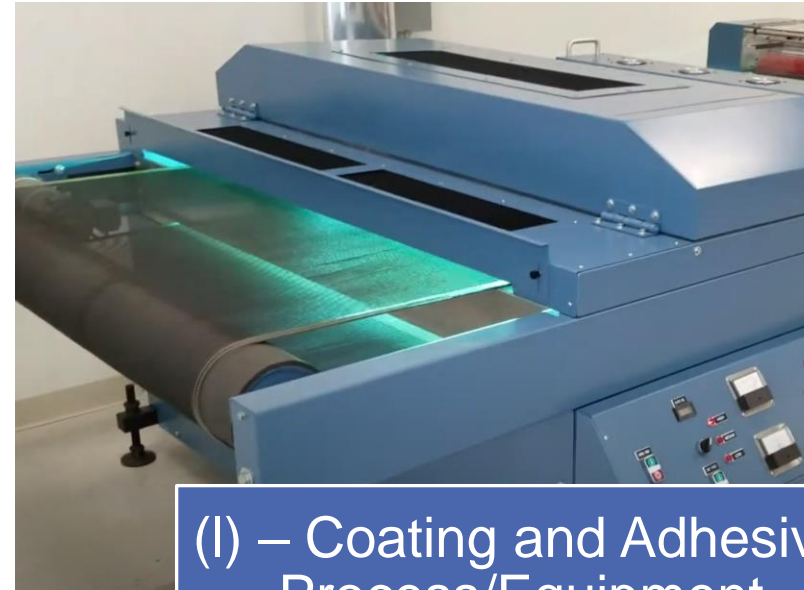
May 2017 – Remove some filing fees for UV/EB/LED technologies

# Overview of Exemptions in Rule 219

- Rule 219 includes two provisions that exempts UV/EB/LED operations



(h) – Printing and  
Reproduction Equipment



(l) – Coating and Adhesive  
Process/Equipment

# UV/EB/LED Exemptions in Rule 219

## Non-Solvent and Non-Waterborne UV/EB/LED Materials

- Printing, coating, and adhesive processes and equipment are exempt if total quantity of UV/EB/LED materials and associated VOC containing solvents (including clean-up) is:
  - 6 gal/day or less, or
  - 132 gal/month or less[pursuant to subparagraphs (h)(1)(C), (l)(6)(B), and (l)(11)(B)]

## Solvent- and Water-Based UV/EB/LED Materials

- Printing processes and equipment are exempt if usage is 2 gal/day or 44 gal/month or less [pursuant to subparagraph (h)(1)(D)]
- Coating and adhesive processes and equipment are exempt if:
  - Solvent-based material usage is 1 gal/day or 22 gal/month or less [pursuant to subparagraph (l)(6)(C)]
  - Waterborne material usage is 3 gal/day or 66 gal/month or less [pursuant to subparagraph (l)(6)(D)]

# Other Available Exemptions in Rule 219

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- Other exemptions available for printing, coating, or adhesives processes and equipment that are **not limited to UV/EB/LED** materials
  - Daily or monthly VOC emission thresholds:
    - Processes and equipment are exempt if VOC emissions are 3 lbs/day or 66 lbs/month or less [pursuant to subparagraphs (h)(1)(A) and (l)(6)(A)]
  - Low VOC content materials and annual limit:
    - Processes and equipment are exempt if:
      - All materials are 50 g/L or less and all cleanup solvents are 25 g/L or less;
      - Total VOC emissions do not exceed 1 ton/year; and
      - A low-VOC verification is submitted to the Executive Officer  
[pursuant to subparagraphs (h)(1)(E) and (l)(6)(F)]

# Background on Current Considerations for UV/EB/LED Operations

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- A UV component was added to an existing solvent-based coating line
  - Existing coating line did not qualify for a Rule 219 exemption
    - Coating exceeds Rule 1136 – Wood Products Coatings VOC limits and is vented to air pollution control equipment for compliance
  - Modification of coating line did not qualify for a 219 exemption
    - Installation of UV component required physical modification of air pollution control equipment due to ventilation requirements
- Facility submitted an application to modify Permit to Operate to incorporate the changes
- A trade association raised objections regarding the need to modify the permit

## Background on Current Considerations for UV/EB/LED Operations *(cont.)*

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During January 2022 Governing Board meeting:

- Commitment was made to start rulemaking in first quarter of 2022
- Board directed staff to provide a status report to Stationary Source Committee on UV/EB/LEB provisions in June 2022

Staff is evaluating additional Rule 219 provisions to further incentivize use of low emitting processes

## Rule 219 Exemptions – Staff's Initial Thoughts

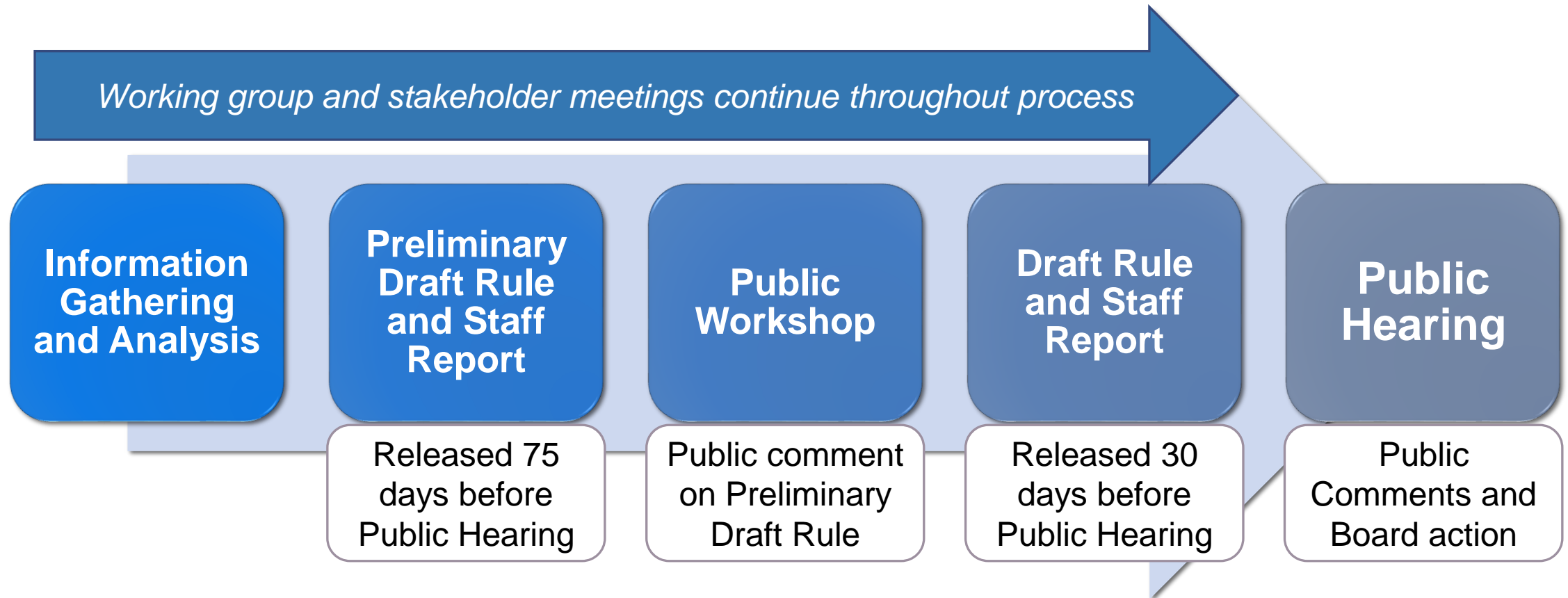
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- Considering exempting process changes when adding UV/EB/LED curing or other technology to an existing permitted coating or printing process if:
  - No increase in VOC emissions
  - Materials do not contain toxic air contaminants
  - No modification to the air pollution control system
- Clarify/update recordkeeping requirements to demonstrate exemption status
- Considering streamlining UV/EB/LED exemptions

# RULE DEVELOPMENT PROCESS



# Overview of Rule Development Process



# Rule 219 Working Group

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- Comprised of stakeholders including industry, environmental groups, community members, and public agencies
- Working group meetings are held throughout the rule development process and open to the public
- Objective
  - Build consensus and work through issues
  - Opportunity for early input
  - Develop a rule that affected facilities can implement
- Assists staff in understanding:
  - Key issues and concerns
  - Industry terms, industry practices, etc.
  - Applicable technologies



# Next Steps

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Continue discussions internally and with U.S. EPA

Working Group Meeting #2 planned for second quarter of 2022

Present update to Stationary Source Committee in June

# PAR 219 Staff Contacts

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Yunnie Osias  
Air Quality Specialist  
(909) 396-3219  
[yosias@aqmd.gov](mailto:yosias@aqmd.gov)

Michael Krause  
Assistant Deputy Executive Director  
(909) 396-2706  
[mkrause@aqmd.gov](mailto:mkrause@aqmd.gov)

Michael Laybourn  
Program Supervisor  
(909) 396-3066  
[mlaybourn@aqmd.gov](mailto:mlaybourn@aqmd.gov)

Heather Farr  
Acting Planning and Rules Manager  
(909) 396-3672  
[hfarr@aqmd.gov](mailto:hfarr@aqmd.gov)