

PROPOSED AMENDED RULE 1107 – COATING OF METAL PARTS AND PRODUCTS

Public Workshop

December 4, 2019

REGULATORY HISTORY

- Adopted in June 1979; Amended 17 times
 - Last amendment in January 2006
- Establishes VOC limits, work practices, test methods, and recordkeeping from metal coating operations
- In September 2008, U.S. EPA released Control Techniques Guideline (CTG) for Metal and Plastic Parts Coatings¹
 - Non-attainment areas are required to implement recommendations in the CTG as soon as practicable² as they represent Reasonably Available Control Technology (RACT)
 - The CTG has more stringent requirements for certain exemptions and includes improved work practices for the storage and handling of coatings

¹https://www3.epa.gov/airquality/ctg_act/200809_voc_epa453_r08003_misc_metal_plasticparts_coating.pdf

²Title 40, Code of Federal Regulations (CFR), Section 51.912

RULE 1107 – APPLICABILITY

Controls volatile organic compound (VOC) emissions from metal coating operations

Includes:

- Fabricated metal product manufacturing
- Architectural and structural metals manufacturing
- Hardware and machinery manufacturing
- Motor vehicle parts manufacturing
- Other metal coating

Excludes:

- Marine craft (Rule 1106 and 1106.1)
- Architectural components coated at structure site (Rule 1113)
- Aerospace Assembly (Rule 1124)
- Metal containers and coils (Rule 1125)
- Magnet wire coating (Rule 1126)
- Motor vehicle (Rule 1151)

PROPOSED RULE LANGUAGE

OVERVIEW OF PROPOSED AMENDMENTS

No changes to VOC limits

Adding work practices for storage and handling of coating-related activities

Removing high volume exemptions

Updating test methods

Clarifying and removing obsolete rule language

DEFINITIONS (Subdivision (b))

- Add definition for Energy Curable Coating (paragraph (b)(15))
 - Defined as single-component reactive products that cures upon exposure to visible light, ultra-violet light, or an electron beam
 - Allows manufacturers to determine VOC content using ASTM D 7767 – Standard Test Method to Measure Volatiles from Radiation Curable Acrylate Monomers, Oligomers, and Blends and Thin Coatings Made from Them
 - Will continue to work with stakeholders to develop an acceptable procedure to allow use of ASTM D 7767 for field samples
- Add test method title for Extreme High-Gloss Coating (paragraph (b)(19))
 - ASTM D 523 – Standard Test Method for Specular Gloss

DEFINITIONS (Subdivision (b))

(continued)

- Update test method for High-Performance Architectural Coating (paragraph (b)(27)) to reflect changes made in Architectural Aluminum Manufacturer Association (AAMA) publications
 - Removed AAMA 605.2-1980
 - Added
 - AAMA 2604-05 – Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels
 - AAMA 2605-05 – Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels

REQUIREMENTS (Subdivision (c))

- Removed obsolete language in the table containing VOC limits (paragraph (c)(2))
 - No change in any VOC limits
- Currently, cloth or paper used in stripping of cured coatings are to be disposed in closed containers (paragraph (c)(4))
 - Expanding work practice to require closed containers for storage or disposal of the following VOC-containing or VOC-laden materials:
 - Coatings, thinners, and coating-related waste materials
 - Application tools such as brushes, pads, rags, etc.
 - Consistent with CTG work practice requirements
 - Provision will help reduce fugitive VOC loss

METHODS OF ANALYSIS (Subdivision (e))

- Added titles of test methods (paragraphs (e)(1) – (e)(4))
- Additional test methods included for determining capture efficiency (paragraph (e)(4))
 - Reflects changes to U.S. EPA's technical guidance document¹
 - Added test methods that were codified into Title 40, Code of Federal Regulations, Part 51, Appendix M, Methods 204-204F

¹<https://ww3.arb.ca.gov/drdb/lbb2001.pdf>

EXEMPTIONS (Subdivision (f))

- Removed obsolete language (paragraph (f)(2))
- Removed exemption for high-performance architectural, vacuum-metalizing, and pretreatment coatings (paragraph (f)(4))
 - Only facility identified using high-performance architectural has pollution control device
 - Categories already allowed specialty coating VOC content limits of 420 g/L
- Removed high-volume exemption for electrocoating (E-coat) (paragraph (f)(8))
 - Advances in technology provide low-VOC, non-hazardous air pollutant (HAP) alternatives
 - Electrocoating process is now a low-VOC alternative to traditional metal coating

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

CEQA

- PAR 1107 is not expected to require physical modifications that would cause a significant adverse effect on the environment
- PAR 1107 is exempt from CEQA and will prepare a Notice of Exemption pursuant to:
 - CEQA Guidelines Section 15061(b)(3) exempts actions where it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment

SCHEDULE AND CONTACTS

PROPOSED AMENDED RULE 1107

Key Dates

- ❑ December 18, 2019 End of Comment Period
- ❑ January 10, 2020 Set Hearing
- ❑ January 24, 2020 Stationary Source Committee
- ❑ February 7, 2020 Public Hearing

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