



## Enhanced Regulatory Outreach Program Maricopa County Air Quality Department Notice of Stakeholder Workshop

**AQ-2015-005-Rule 336:Surface Coating Operations**  
**Date/Time: Thursday, February 18, 2016 at 9:00 am**  
**Location: 1001 North Central Avenue, Floor 5 Classroom\***

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The Maricopa County Air Quality Department will conduct a Stakeholder Workshop to discuss proposed revisions to AQ-2015-005-Rule 336 (Surface Coating Operations). The draft rule to be discussed during this workshop is attached to this announcement.

Discussion will focus on:

- Rule 336, Section 102 (Applicability)
- Rule 336, Section 103 (Exemptions): Review the corrected list of exemptions and compare it to:
  - a. Recommended list of exemptions in the CTG (Miscellaneous Surface Coatings)
  - b. Exemptions in the current rule
- Rule 336, Section 200 (Definitions): Review of new definitions, which explain new coating categories listed in the tables in Rule 336
- Review of new VOC coating categories that require lower VOC thresholds
- Rule 336, Section 304.5 (Surface Preparation) VOC limits
- Rule 336, Section 305 (Emission Control System (ECS) Requirements)
- Removal of all adhesives (Rule 357) from Rule 336
- Comparison of Rule 336, Section 103.7(a) (Aerosol Can Exemption) with Rule 200, Section 303.3(c)(3).
- Review of glass coating VOC limit

Additional information is available on the Enhanced Regulatory Outreach Program (EROP) website ([www.maricopa.gov/regulations](http://www.maricopa.gov/regulations)). The Stakeholder Workshop is an informal meeting for all interested parties, is free of charge and no advance registration or RSVP is required. If you would like to remotely attend this workshop, please contact Michelle Mada at (602) 372-1465.

\*If you will be attending this workshop in-person, when you arrive at 1001 North Central Avenue, please check-in in Suite #125 then proceed to the Floor 5 classroom. Thank you for participating in the rulemaking process.

**AQ-2015-005-Draft Rule 336**

Stakeholder Workshop: Thursday, February 18, 2016  
Contact: Kathleen Sommer – 602-506-6706  
[kathleensommer@mail.maricopa.gov](mailto:kathleensommer@mail.maricopa.gov)

**Maricopa County Air Quality Dept.**

Planning & Analysis Division  
1001 N. Central Ave. Ste. 125  
Phoenix, AZ 85004

**The following is a summary of revisions to draft Rule 336 (Surface Coating Operations) dated February 18, 2016, since the previous workshop for draft Rule 336 conducted on December 17, 2015:**

**PROPOSE in Section 100 (Applicability and Exemptions):**

- To remove and replace Section 102.3
- To remove Pleasure Craft Surface Coating and move it to Section 301.5 and replace it with Section 103.1
- To restructure and clarify Section 103
- To delete Sections 103.1, 103.2, and 103.3
- To re-title Section 103 to “Partial Exemptions” and incorporate Section 105 into this restructured section
- To change Section 103 to list six - Sections 103.1 through 103.6

**PROPOSE in Section 200 (Definitions):**

- To change Drum
- To change Pressure Sensitive Tape
- To change Pressure Sensitive Label
- To change VOC Borne Coating
- To change VOC Content
- To add Dip Coating
- To add Electric Insulating Varnish
- To add Electromagnetic Interference (EMI)/ Radio-Frequency Interference (RFI) Shielding
- To add Flow Coat
- To add Fog Coat
- To add Multi-colored Coating
- To add Multi-Component Coating
- To add One-Component Coating
- To add Textured Coat
- To remove Exempt Evaporating Components
- To remove Minus Exempt Compounds or Minus Exempt Evaporating Components
- To remove Non Precursor Organic Compound
- To remove Other Metal Parts and Products
- To remove Total VOC Vapor Pressure (VOC Composite Partial Pressure)

**PROPOSE in Section 300 (Standards):**

- To clarify text Section 301.2
- To reverse columns of coating limits to match units of other tables - Table 336-2, Table 336-5, and Table 336-6
- To remove section regarding Manufacturers and Suppliers
- To clarify Section 301.5 (Pleasure Craft Surface Coating)
- To add Refrigerated glass door coatings category to Table 336-5
- To raise three threshold limits in Table 336-7 (Extreme High Gloss Topcoat; Finish Primer Surfacer; Other Substrate Anti-foulant Coating)
- To change Section 304.5 (Surface Preparation) to be consistent with other County rules
- To clarify Section 302.1(e) and Section 302.1(f)
- To eliminate redundancy of “Low Usage Allowance for Restricted Guns” in Section 302 and move it to Section 103 (Exemptions)
- To clarify Section 302.2(g) to allow other coating application methods
- To remove Section 302.2(h) and restate it in Exemptions section
- To clarify and correct Section 303.1(b) - spray-gun cleaning machine requirements
- To remove vapor pressure requirement from Section 303.2 (Manual Spray-Gun Cleaning Requirements)
- To clarify and streamline Section 304 (Work Practices-Handling, Disposal, and Storage of VOC-Containing Material)
- To clarify Section 305 (Emission Control System (ECS) Requirements)

**PROPOSE in Section 400 (Administrative Requirements):**

- To clarify the Compliance schedule for VOC limits
- To clarify the compliance schedule for an O & M Plan

**PROPOSE in Section 500 (Monitoring and Records):**

- To correct text in Section 501.1 (Recordkeeping and Reporting)
- To add recordkeeping requirement for aerosol spray cans in Section 501.1(d)



**AQ-2015-005-Draft Rule 336**

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[kathleensommer@mail.maricopa.gov](mailto:kathleensommer@mail.maricopa.gov)

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1001 N. Central Ave. Ste. 125

Phoenix, AZ 85004

- To eliminate vapor pressure recording requirement in Section 501.1
- To correct consecutive numbering and references in Section 504 (Compliance Determination and Test Methods)
- To eliminate formula for total VOC vapor pressure



**MARICOPA COUNTY**  
**AIR POLLUTION CONTROL REGULATIONS**

**REGULATION III – CONTROL OF AIR CONTAMINANTS**

**RULE 336**  
**SURFACE COATING OPERATIONS**  
**INDEX**

**SECTION 100 – GENERAL**

- 101 PURPOSE
- 102 APPLICABILITY
- 103 PARTIAL EXEMPTIONS
- 104 TOTAL CATEGORICAL EXEMPTIONS

**SECTION 200 – DEFINITIONS**

- 201 ADHESIVE
- 202 ADHESION PRIMER
- ~~202 AEROSOL CAN~~
- 203 AEROSOL CAN-SPRAY COATING
- ~~203~~ 204 AIR-DRIED COATING
- 205 ANTIFOULANT COATING
- ~~204~~ 206 BAKED COATING
- 207 BUSINESS MACHINE.
- 208 CAMOUFLAGE COATING
- ~~205~~ 209 CAN COATING
- ~~206~~ 210 CAN PRINTING INK
- ~~207~~ 211 CLEAR COAT
- 212 CLEAR WOOD FINISHES
- 213 COATING APPLICATION EQUIPMENT
- ~~208~~ 214 COIL COATING
- ~~209~~ 215 DAY
- 216 DIP COATING
- 217 DRUM COATING
- 218 ELECTRIC DISSIPATING COATING
- 219 ELECTRIC INSULATING VARNISH
- 220 ELECTROMAGNETIC INTERFERENCE (EMI)/RADIO-FREQUENCY INTERFERENCE (RFI) SHIELDING
- ~~210~~ 221 ELECTROSTATIC SPRAY/SYSTEM
- ~~211~~ 222 EMISSION CONTROL SYSTEM (ECS)
- ~~212~~ 223 END SEALING COMPOUND
- 224 ETCHING FILLER



	213	<u>EXEMPT EVAPORATING COMPONENTS (EXEMPT COMPOUNDS)</u>
214	225	EXTERIOR <u>CAN</u> BASECOAT
	226	<u>EXTREME HIGH-GLOSS COATING</u>
215	227	EXTREME-PERFORMANCE COATING
216	228	FABRIC
217	229	FABRIC COATING
	230	<u>FILLER</u>
218	231	FILM COATING
	232	<u>FINISH PRIMER/ SURFACER</u>
	233	<u>FLEXIBLE COATING</u>
219	234	FLEXIBLE PLASTIC PART OR PRODUCT
	235	<u>FLOW COAT</u>
	236	<u>FOG COAT</u>
	237	<u>GEL COAT</u>
	238	<u>GLOSS REDUCER</u>
	239	<u>HAND APPLICATION METHODS</u>
	240	<u>HEAT-RESISTANT COATING</u>
	241	<u>HIGH-PERFORMANCE ARCHITECTURAL COATING</u>
	242	<u>HIGH BUILD PRIMER/SURFACER</u>
	243	<u>HIGH GLOSS COATING</u>
	244	<u>HIGH-TEMPERATURE COATING</u>
	220	<del>HEAT SENSITIVE MATERIAL</del>
	245	<u>HIGH-VOLUME, LOW PRESSURE (HVLP) SPRAY GUN</u>
221	246	HIGHWAY VEHICLE
222	247	INTERIOR BASECOAT
223	248	INTERIOR BODY SPRAY
	249	<u>IN USE OR HANDLED</u>
224	250	<u>LARGE APPLIANCE</u>
225	251	LOW PRESSURE SPRAY GUN
	252	<u>MARINE VESSEL</u>
226	253	METAL FURNITURE
	254	METALLIC COATING
	255	<u>MILITARY SPECIFICATION COATING</u>
	227	<del>MINUS EXEMPT COMPOUNDS or MINUS EXEMPT EVAPORATING COMPONENTS</del>
	256	<u>MIRROR BACKING COATING</u>
228	257	MOBILE EQUIPMENT
	258	<u>MOLD-SEAL COATING</u>



	<u>259</u>	<u>MULTI-COLORED COATING</u>
	<u>260</u>	<u>MULTI-COMPONENT COATING</u>
	<del>229</del>	<del>ORGANIC COMPOUND</del>
	<u>261</u>	<u>ONE-COMPONENT COATING</u>
	<u>262</u>	<u>OPTICAL COATING</u>
	<del>230</del>	<del>OTHER METAL PARTS AND PRODUCTS</del>
<del>231</del>	<u>263</u>	<u>OVERVARNISH</u>
	<u>264</u>	<u>PAN BACKING COATING</u>
<del>232</del>	<u>265</u>	<u>PAPER COATING</u>
<del>233</del>	<u>266</u>	<u>PLASTIC</u>
	<u>267</u>	<u>PLEASURE CRAFT</u>
	<u>268</u>	<u>PLEASURE CRAFT COATING:</u>
	<del>234</del>	<del>POLYESTER AND POLYESTER RESIN</del>
	<del>235</del>	<del>POLYESTER COMPOSITE</del>
	<u>269</u>	<u>PREFABRICATED ARCHITECTURAL COMPONENT COATING</u>
	<u>270</u>	<u>PRESSURE SENSITIVE TAPE OR LABEL</u>
	<u>271</u>	<u>PRETREATMENT COATING</u>
	<u>272</u>	<u>PRETREATMENT WASH PRIMER</u>
<del>236</del>	<u>273</u>	<u>PRIMER</u>
<del>237</del>	<u>274</u>	<u>QUALITY CLASS Q</u>
<del>238</del>	<u>275</u>	<u>REFINISHING</u>
<del>239</del>	<u>276</u>	<u>REPAIR COATING</u>
<del>240</del>	<u>277</u>	<u>RESTRICTED SPRAY GUN</u>
	<u>278</u>	<u>SHOCK-FREE COATING</u>
<del>241</del>	<u>279</u>	<u>SILICONE RELEASE COATING</u>
<del>242</del>	<u>280</u>	<u>SMALL SURFACE COATING SOURCE (SSCS)</u>
	<u>281</u>	<u>SOLAR-ABSORBENT COATING</u>
	<u>282</u>	<u>STENCIL COATING</u>
<del>243</del>	<u>283</u>	<u>STRIPPABLE BOOTH COATING</u>
<del>244</del>	<u>284</u>	<u>SURFACE COATING</u>
<del>245</del>	<u>285</u>	<u>SURFACE COATING OPERATION</u>
	<u>286</u>	<u>SURFACE PREPARATION</u>
	<u>287</u>	<u>TEXTURE COATING</u>
<del>246</del>	<u>288</u>	<u>THREE-PIECE CAN SIDE-SEAM COAT – <u>SPRAY</u></u>
<del>247</del>	<u>289</u>	<u>TOPCOAT</u>
	<del>248</del>	<del>TOTAL VOC VAPOR PRESSURE (VOC COMPOSITE PARTIAL PRESSURE)</del>
<del>249</del>	<u>290</u>	<u>TOUCH-UP COATING</u>



- 291     TRANSFER EFFICIENCY
- 250     292     TWO-PIECE CAN EXTERIOR END COAT
- 293     TWO-COMPONENT COATING
- 294     VACUUM-METALIZING COATING
- 251     295     VINYL COATING (COATING ON VINYL)
- 252     ~~VOC BORNE COATING~~
- 253     ~~VOC BORNE DILUENT~~
- 296     VOC ACTUAL
- 254     297     VOC CONTENT
- 298     VOC REGULATORY

**SECTION 300 – STANDARDS**

- 301     SURFACE COATINGS
- 302     APPLICATION METHODS FOR SURFACE COATINGS
- 303     CLEANUP OF APPLICATION EQUIPMENT
- 304     WORK PRACTICES –HANDLING, DISPOSAL AND STORAGE OF VOC-CONTAINING MATERIAL
- 305     ~~EXEMPTIONS:~~
- 306     305     ~~REQUIREMENTS FOR AIR POLLUTION CONTROL EQUIPMENT AND EMISSION CONTROL SYSTEM (ECS) MONITORING EQUIPMENT REQUIREMENTS~~

**SECTION 400 – ADMINISTRATIVE REQUIREMENTS**

- 401     COMPLIANCE SCHEDULE VOC LIMITS
- 402     COMPLIANCE SCHEDULE O&M PLAN

**SECTION 500 – MONITORING AND RECORDS**

- 501     RECORDKEEPING AND REPORTING
- 502     ECS RECORDING REQUIREMENTS
- 503     O&M PLAN RECORDS
- 503     504     COMPLIANCE DETERMINATION AND TEST METHODS



~~Revised 07/13/88~~  
~~Revised 09/21/92~~  
~~Revised 06/19/96~~  
~~Revised 04/07/99~~  
~~Revised 09/25/13~~

Revised 07/13/1988; Revised 09/21/1992; Revised 06/19/1996; Revised 04/07/1999; Revised 09/25/13; Revised MM/DD/YYYY

**MARICOPA COUNTY  
 AIR POLLUTION CONTROL REGULATIONS**

**REGULATION III – CONTROL OF AIR CONTAMINANTS**

**RULE 336  
 SURFACE COATING OPERATIONS**

**SECTION 100 – GENERAL**

**101 PURPOSE:** To limit the emission of volatile organic compounds (VOCs) from surface coating operations.

**102 APPLICABILITY:** This rule applies to VOC coating operations listed in Sections 102.1 through 102.4 of this rule, Table 1 of this rule that are not more specifically regulated by another rule within Maricopa County Rules 300 to 359 of Regulation III. Examples of coating operations not regulated by this rule appear as listed in subsection 305.1, Section 104 of this rule.

**102.1** Surface-coating activities regulated under this rule include, but are not limited to, the application of coating, coating preparation/mixing at the facility applying the coating, and the cleanup of coating application equipment.

**102.2** ~~Subsections 305.2 Section 103 through 305.7 set sets~~ forth partial or conditional exemptions for certain materials or uses employed by a surface coating operation subject to this rule.

**102.3** This rule is not applicable to coatings or solvents having a VOC content, minus exempt compounds, of less than 0.15 lb VOC/gal (18g/L). ~~nor to solvents having a VOC content of material less than 0.15 lb VOC/gal.~~

**102.4 NSPS & NESHAP:** In addition to this rule, facilities may be subject to New Source Performance Standards (NSPS) in Rule 360 and/or to National Emission Standards for Hazardous Air Pollutants (NESHAP) in Rule 370 of these Rules and Regulations.

**103 PARTIAL EXEMPTIONS:**

**103.1 Qualified Materials Exemption:**

**a. Leak-Preventing Materials:** Sealants, caulking, and similar materials used on the following substrates for the primary purpose of leak prevention are exempt from this rule:

- (1)** Non-metallic substrates; and
- (2)** Post manufacture, such as, but not limited to, old joints and seals on pipe and valve assemblies.

**b. Certain Joint Fillers:** Caulking and beaded sealants used to fill gaps or to fill joints between surfaces are exempt from this rule, except those used in manufacturing other metal parts and products or in the manufacturing of cans.

**103.2 Extreme Performance Coatings:** Extreme performance coatings are exempt from the VOC limits in Tables 336-1 through 336-7 of this rule but not from any other sections of this rule when used under the following conditions:



- a. Used on internal combustion engine components that are normally above 250°F (121°C) during use; or
- b. Used at temperatures above 250°F (121°C) on items that are both included under the North American Industry Classifications System (NAICS) codes 334210, 334220, 334290, 334416, 334417, 334418, 334419, 334310 or 336419 and are electronic products in space vehicles and/or are communications equipment.

**103.3 Plastic Parts Coating Exemption:** The following types of plastic parts coatings are exempt from the VOC limits in Tables 336-1 through 336-7 of this rule but are subject to the remaining provisions of this rule.

- a. Stencil coatings applied on clear or transparent substrates.
- b. Clear or translucent coatings.
- c. Coatings applied at a paint manufacturing facility while conducting performance tests on the coatings.
- d. If substitute compliant coatings are not available and a facility that uses less than 50 gallons per year of an individual coating category and does not exceed 200 gallons per year total usage of all such coatings.
- e. Reflective coating applied to highway cones.
- f. Mask coatings that are less than 0.5 millimeter thick (dried) and the area coated is less than 25 square inches.
- g. Electromagnetic Interference (EMI)/ Radio-Frequency Interference (RFI) shielding coatings.
- h. Heparin-benzalkonium chloride (HBAC)-containing coatings applied to medical devices, provided that the total usage of all such coatings does not exceed 100 gallons per year, per facility.
- i. Business machine plastic part coating:
  - (1) Texture coatings.
  - (2) Vacuum metalizing coatings.
  - (3) Gloss reducers.
  - (4) Adhesion primers.
  - (5) Electrostatic preparation coatings.
  - (6) Resist coatings.
  - (7) Stencil coatings.

**103.4 Application Methods Exemptions:** The following coatings are exempt from application methods in Section 302 of this rule but are subject to the remaining provisions of this rule:

- a. Metal part texture coatings.
- b. Plastic part coating for airbrush operations using less than 5 gallons per year of coating.
- c. Extreme high gloss coatings for pleasure craft surface coating operations.

**103.5 Application Methods and VOC-Limit Exemptions:** The following surface coating operations are exempt from VOC limits listed in Tables 336-1 through 336-7 of this rule, the Emissions Control System (ECS) requirements in Section 305 of this rule, and the application methods listed in Section 302 of this rule, but shall comply with the work practices listed in Sections 303 and 304 of this rule and the recordkeeping provisions listed in Section 500 of this rule:

- a. Aerosol can spray coating.



- b.** Touch up or repair-coating operations.
- c.** Low usage coatings which in aggregate of all formulations do not exceed 55 gallons (208 liters) per year facility-wide. The operator shall update usage records of these coatings on each day of their use, pursuant to Section 501.2 of this rule.
- d.** **A Small Surface-Coating Source:** For a Maricopa County facility that does not have either a 15 lb/day or a 2 ton/year VOC-emission limit in an Air Pollution Permit for processes regulated by this rule, an owner or operator may qualify for the exemption if s/he agrees in writing to enforceable permit conditions that establish these or stricter limits.
- e.** A Quality Class Q protective coating that is used on equipment, structures, and/or components within a containment facility of a nuclear power plant.
- f.** A tactical military-equipment coating that is approved in a Maricopa County Air Pollution Permit subsequent to a sufficient demonstration by the user that no compliant substitute exists.
- g. Large Appliance Coating:**
  - (1)** Stencil coatings.
  - (2)** Safety-indicating coatings.
  - (3)** Solid-film lubricants.
  - (4)** Electric-insulating and thermal-conducting coatings.
  - (5)** Coating application utilizing hand-held aerosol cans.
- h. Metal Parts Coating:**
  - (1)** Stencil coatings.
  - (2)** Safety-indicating coatings.
  - (3)** Solid-film lubricants.
  - (4)** Electric-insulating and thermal-conducting coatings.
  - (5)** Magnetic data storage disk coatings.
  - (6)** Plastic extruded onto metal parts to form a coating.

**103.6** **Low Usage Allowance for Restricted Guns:** Spray guns otherwise prohibited by Section 302 of this rule for use with coatings over 2 lbs. VOC/gal. minus exempt compounds, are exempt from this rule under the following limited conditions:

- a.** If VOC emissions from the finishing application are captured and directed to an ECS complying with the provisions of Section 305 of this rule; or
- b.** To coat the inside of pipes and tubes with a wand-style applicator; or
- c.** Using an airbrush or other small gun that has a reservoir capacity not exceeding 250 cc (8.8 fluid ounces) and is used solely for detailing, lettering, touchup, and/or repair.

**104** **TOTAL CATEGORICAL EXEMPTIONS:** This rule does not apply to the following operations:

- 104.1** Aerospace coating operations (Rule 348).
- 104.2** Architectural coatings including buildings and erected structures (Rule 335).
- 104.3** Solvent cleaning (Rule 331).
- 104.4** Marine vessel exterior refinishing (EPA 453/B-97-001).
- 104.5** Polyester resin operations (Rule 356).
- 104.6** Printing and graphic arts coating (Rule 337).
- 104.7** Semiconductor manufacturing (Rule 338).



- 104.8** Coating or refinishing a highway vehicle or mobile equipment (Rule 345).
- 104.9** Coating wood furniture and fixtures (Rule 342).
- 104.10** Coating wood millwork (Rule 346).
- 104.11** Miscellaneous industrial adhesives (Rule 357)

**SECTION 200 – DEFINITIONS:** For the purpose of this rule, the following definitions shall apply, in addition to those definitions found in Rule 100 (General Provisions and Definitions) of these rules. In the event of any inconsistency between any of the Maricopa County air pollution control rules, the definitions in this rule take precedence.

- 201** **ADHESIVE:** A material used for the primary purpose of bonding two or more surfaces together.
- 202** **ADHESION PRIMER:** A coating that is applied to a plastic polymer part to promote the adhesion of a subsequent coating.
- ~~202~~ **AEROSOL CAN:** ~~A non-refillable hand held container from which a product is dispensed by means of pressurized propellant packaged within the container.~~
- 203** **AEROSOL CAN-SPRAY COATING:** A coating which is sold in a hand-held, pressurized, non-refillable container, of less than 22 fluid ounces (0.66 liter) capacity, and which is expelled from the container in a finely divided form when a valve on the container is depressed.
- ~~203~~ **204** **AIR-DRIED COATING:** A coating which is dried by the use of air or forced warm air at temperatures up to and including 200°F (93.3°C).
- 205** **ANTIFOULANT COATING:** A coating applied to the underwater portion of a pleasure craft to prevent or reduce the attachment of biological organisms, and registered with the United States Environmental Protection Agency (EPA) as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code Section 136).
- ~~204~~ **206** **BAKED COATING:** A coating that is dried or cured in an oven in which the oven temperature exceeds 200°F (93.3°C).
- 207** **BUSINESS MACHINE:** A device that uses electronic or mechanical methods to process information, perform calculations, print or copy information, or convert sound into electrical impulses for transmission, such as:
  - 207.1** Products classified as typewriters under SIC Code 3572;
  - 207.2** Products classified as electronic computing devices under SIC Code 3573;
  - 207.3** Products classified as calculating and accounting machines under SIC Code 3574;
  - 207.4** Products classified as telephone and telegraph equipment under SIC Code 3661;
  - 207.5** Products classified as office machines, not elsewhere classified, under SIC Code 3579; and (6) photocopy machines, a subcategory of products classified as photographic equipment under SIC Code 3861.
- 208** **CAMOUFLAGE COATING:** A coating used, principally by the military, to conceal equipment from detection.
- ~~205~~ **209** **CAN COATING:** ~~Any~~ A coating either used in the production of metal cans applied to the surface(s) of formed cans or applied at a can making facility to the surface(s) of flat metal sheets or strips that are formed there into cans.



- 206 **210** **CAN PRINTING INK:** A fluid or viscous formulation used in can printing that imparts design, pattern, and/or alphanumeric symbols to a can.
- 207 **211** **CLEAR COAT:** ~~Any~~ A coating which lacks color or opacity or is transparent.
- 212** **CLEAR WOOD FINISHES:** Clear and semi-transparent coating layers applied to wood substrates to provide a transparent or translucent film.
- 213** **COATING APPLICATION EQUIPMENT:** Any spray gun, wand, rollers, brushes or any other means used to apply or cover a surface with a coating for either beauty, protection or other purpose.
- 208 **214** **COIL COATING:** ~~Any~~ A coating applied to the surface(s) of flat metal sheets or strips that are formed into rolls or coils not used to make cans.
- 209 **215** **DAY:** A period of 24 consecutive hours beginning at midnight.
- 216** **DIP COATING:** A method of applying a coating to a substrate by submersion into and removal from a coating bath.
- 217** **DRUM COATING:** Coating of a cylindrical metal shipping container larger than 12 gallons capacity but no larger than 110 gallons capacity.
- 218** **ELECTRIC DISSIPATING COATING:** A coating that rapidly dissipates a high-voltage electric charge.
- 219** **ELECTRIC INSULATING VARNISH:** A non-convertible-type coating applied to electric motors, components of electric motors, or power transformers, to provide electrical, mechanical, and environmental protection or resistance.
- 220** **ELECTROMAGNETIC INTERFERENCE (EMI)/ RADIO-FREQUENCY INTERFERENCE (RFI) SHIELDING:** A coating used on electrical or electronic equipment to provide shielding against electromagnetic interference, radio frequency interference, or static discharge.
- 210 **221** **ELECTROSTATIC SPRAY/SYSTEM:** A method of applying atomized paint by electrically charging the coating and the object being coated with opposing charges. A higher proportion of the coating reaches and coats the object than would occur in the absence of a charge.
- 211 **222** **EMISSION CONTROL SYSTEM (ECS):** A system, approved in writing by the Control Officer, designed and operated in accordance with good engineering practice to reduce emissions of volatile organic compounds. Such system consists of an emissions collection subsystem and an emissions processing subsystem.
- 212 **223** **END SEALING COMPOUND:** A compound which is coated onto can ends and functions as a gasket when the end is attached to the can.
- 224** **ETCHING FILLER:** A coating that contains less than 23 percent solids by weight and at least ½ percent acid by weight, and is used instead of applying a pretreatment coating followed by a primer.
- 213 **~~EXEMPT EVAPORATING COMPONENTS (EXEMPT COMPOUNDS):~~** ~~The non-VOC, evaporating portion of a coating formulation; this necessarily includes all non-precursor organic compounds, as well as water and other inorganic liquids and gases.~~
- 214 **225** **EXTERIOR CAN BASECOAT:** ~~Any~~ A coating applied to the exterior of a can to provide protection for the metal or to provide background for any lithographic or printing operation.
- 226** **EXTREME HIGH-GLOSS COATING:** A coating when tested by the American Society for Testing Material Test Method D-523 adopted in 1980 shows reflectance of 75 or more on a 60° meter.



- 215 **227** **EXTREME-PERFORMANCE COATING:** A coating used on a surface where the coated surface in its intended use is at temperatures consistently in excess of 250°F (121°C). Extreme-performance coatings include but are not limited to, coatings applied to locomotives, railroads cars, farm machinery, plastic, rubber, leather, or glass.
- 216 **228** **FABRIC:** A textile material. Non-manufactured items from nature are not fabric except for natural threads, fibers, filaments, and similar that have been manufactured into textile fabric.
- 217 **229** **FABRIC COATING:** ~~Any~~ A decorative or protective coating or reinforcing material applied onto or impregnated into textile fabric.
- 230** **FILLER:** A relatively non-adhesive substance added to an adhesive to improve its working properties, permanence, strength, or other qualities.
- 218 **231** **FILM COATING:** ~~Any~~ A coating applied in a web coating process on film substrate other than paper or fabric, including, but not limited to, typewriter ribbons, photographic film, magnetic tape, and metal foil gift wrap.
- 232** **FINISH PRIMER/SURFACER:** A coating applied with a wet film thickness of less than 10 mils prior to the application of a topcoat for purposes of providing corrosion resistance, adhesion of subsequent coatings, a moisture barrier, or promotion of a uniform surface necessary for filling in surface imperfections.
- 233** **FLEXIBLE COATING:** A coating that is required to comply with engineering specifications for impact resistance, mandrel bend, or elongation as defined by the original equipment manufacturer.
- 219 **234** **FLEXIBLE PLASTIC PART OR PRODUCT:** A plastic part or product designed to withstand significant deformation without damaging it for its intended use. Not included are flexible plastic parts that are found on a can, coil, metal furniture, or large appliance, or that are already a part of an aerospace component, highway vehicle, mobile equipment, architectural building or structure, or a previously coated marine-vessel .
- 235** **FLOW COAT:** A non-atomized technique of applying coatings to a substrate with a fluid nozzle in a fan pattern with no air supplied to the nozzle.
- 236** **FOG COAT:** A coating that is applied to a plastic part for the purpose of color matching without masking a molded-in texture. A fog coat shall not be applied at a thickness of more than 0.5 mils of coating solids.
- 237** **GEL COAT:** A thermosetting polyester resin surface coating, either pigmented or clear, that provides a cosmetic enhancement and improves resistance to degradation from exposure to the elements.
- 238** **GLOSS REDUCER:** A coating that is applied to a plastic part solely to reduce the shine of the part and is applied at a thickness of less than or equal to 0.5 mils of coating solids.
- 239** **HAND APPLICATION METHODS:** Application of coatings by non-mechanical, hand-held equipment including but not limited to paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags, and sponges.
- 240** **HEAT-RESISTANT COATING:** A coating that must withstand a temperature of at least 400°F during normal use.
- 241** **HIGH PERFORMANCE ARCHITECTURAL COATING:** A coating used to protect architectural subsections and which meets the requirements of the Architectural Aluminum Manufacturer Association's publication number AAMA 2604-05 (Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels) or 2605-05 (Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels).



- 242** **HIGH BUILD PRIMER/SURFACER:** A coating applied with a wet film thickness of 10 mils or more prior to the application of a topcoat for purposes of providing corrosion resistance, adhesion of subsequent coatings, or a moisture barrier, or promoting a uniform surface necessary for filling in surface imperfections.
- 243** **HIGH GLOSS COATING:** A coating which achieves at least 85 percent reflectance on a 60<sup>o</sup> meter when tested by ASTM D 523-89.
- 244** **HIGH TEMPERATURE COATING:** A coating that is certified to withstand a temperature of 1000°F for 24 hours.
- 220 ~~HEAT SENSITIVE MATERIAL: Materials which cannot consistently be exposed to temperatures greater than 203°F (95°C) without materially affecting desired function, performance, or other characteristics~~
- 245** **HIGH-VOLUME, LOW PRESSURE (HVLP) SPRAY-GUN:** Spray equipment that is permanently labeled as such and used to apply any coating by means of a spray-gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.
- 221 **246** **HIGHWAY VEHICLE:** ~~Any~~ A vehicle that is physically capable of being driven upon a highway including, but not limited to, cars, pickups, vans, trucks, truck-tractors, motor-homes, motorcycles, and utility vehicles.
- 222 **247** **INTERIOR BASECOAT:** ~~Any~~ A coating applied to the interior of a can to provide a protective lining between the intended contents and the metal shell of the can.
- 223 **248** **INTERIOR BODY SPRAY:** ~~Any~~ A coating sprayed onto the interior of a can to provide a protective film between the intended contents and the metal shell of the can.
- 249** **IN USE OR HANDLED:** Actively engaging the materials with activities such as mixing, depositing, brushing, rolling, padding, wiping or removing or transferring material into or out of the container.
- 224 **250** **LARGE APPLIANCE:** A door, case, lid, panel, or interior support part of residential and commercial washers, dryers, ranges, refrigerators, freezers, water heaters, dishwashers, trash compactors, air conditioners, evaporative coolers, and other similar products.
- 225 **251** **LOW PRESSURE SPRAY GUN:** An air-atomized spray gun that, by design, functions best at tip pressures below 10 psig (516 mm Hg), measured according to Section ~~503.14~~ 504.1(d) of this rule, and for which the manufacturer makes no claims to the public that the gun can be used effectively above 12 psig (619 mm Hg).
- 252** **MARINE VESSEL:** A tugboat, tanker, freighter, passenger ship, barge, or other boat, ship or watercraft used for commercial purposes. This definition excludes those boats used primarily for recreational purposes.
- 226 **253** **METAL FURNITURE:** ~~Any furniture~~ Furniture made of metal or any metal part which will be assembled with other parts made of metal or other material(s) to form a furniture piece.
- 254** **METALLIC COATING:** A coating which contains more than 5 grams of metal particles per liter of coating as applied.
- 255** **MILITARY SPECIFICATION COATING:** A coating that has a formulation that has been approved by a United States Military Agency for use on military equipment.
- 227 ~~MINUS EXEMPT COMPOUNDS or MINUS EXEMPT EVAPORATING COMPONENTS : See VOC Content Minus Exempt Compounds.~~
- 256** **MIRROR BACKING COATING:** A coating applied onto the silvered surface of a mirror.



- 228 **257** MOBILE EQUIPMENT: ~~Any equipment~~ Equipment that is physically capable of being driven or drawn upon a highway including, but not limited to, the following types of equipment: construction vehicles (such as mobile cranes, bulldozers, concrete mixers); farming equipment (wheel tractor, plow, pesticide sprayer); hauling equipment (truck trailers, utility bodies, camper shells); and miscellaneous equipment (street cleaners, mopeds, golf carts).
- 258** MOLD-SEAL COATING: The initial coating applied to a new mold or a repaired mold to provide a smooth surface which, when coated with a mold release coating, prevents products from sticking to the mold.
- 259** MULTI-COLORED COATING: A coating that is packaged in a single container, applied in a single coat and exhibits more than one color when applied.
- 260** MULTI-COMPONENT COATING: A coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, prior to application to form an acceptable dry film.
- 229 ~~ORGANIC COMPOUND:~~ ~~Any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, carbonates, and metallic carbides.~~
- 261** ONE-COMPONENT COATING: A coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component.
- 262** OPTICAL COATING: A coating applied to an optical lens.
- 230 ~~OTHER METAL PARTS AND PRODUCTS:~~ ~~Any metal part or product, excluding the following items that are made of metal: can, coil, furniture, large appliance, aerospace component, metal foil, metal textile fabric, semiconductor metal, highway vehicle, mobile equipment, an architectural building or structure, a previously coated marine vessel.~~
- 231 **263** OVERVARNISH: ~~Any~~ A coating applied to a can to reduce the coefficient of friction, to provide gloss, or to protect the finish against abrasion and/or corrosion.
- 264** PAN BACKING COATING: A coating applied to the surface of pots, pans, or other cooking implements that are exposed directly to a flame or other heating element.
- 232 **265** PAPER COATING: ~~Any~~ A coating applied on or impregnated into paper, including, but not limited to, adhesive tapes ~~and labels~~, book covers, post cards, office copier paper, and drafting paper ~~and pressure sensitive tapes~~.
- 233 **266** PLASTIC: Substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites. Any solid, synthetic: resin, polymer, or elastomer, except rubber. For the purposes of this rule, plastic film is considered film; fabric and paper made of polymeric plastic fibers are considered fabric and paper, respectively.
- 267** PLEASURE CRAFT: Vessels which are manufactured or operated primarily for recreational purposes, or leased, rented, or chartered to a person or business for recreational purposes.
- 268** PLEASURE CRAFT COATING: A marine coating that is applied to or intended by the manufacturer to be applied to pleasure craft.
- 234 ~~POLYESTER AND POLYESTER RESIN:~~ ~~A complex, polymeric ester containing difunctional acids.~~
- 235 ~~POLYESTER COMPOSITE:~~ ~~Cured material made of polyester resin with reinforcing material imbedded in it, such as glass fibers.~~
- 269** PREFABRICATED ARCHITECTURAL COMPONENT COATING: A coating applied to metal parts and products which are to be used as an architectural structure.



- 270**     **PRESSURE SENSITIVE TAPE OR LABEL:** A flexible strip of paper, backing material or other material that is coated on one side with a permanently tacky adhesive which will adhere to a variety of surfaces with light pressure.
- 271**     **PRETREATMENT COATING:** A coating which contains no more than 12 percent solids by weight, and at least 1/2 percent acid, by weight, is used to provide surface etching, and is applied directly to metal surfaces to provide corrosion resistance, adhesion and ease of stripping.
- 272**     **PRETREATMENT WASH PRIMER:** A coating which contains no more than 12 percent solids, by weight, and at least ½ percent acids, by weight, is used to provide surface etching, and is applied directly to fiberglass and metal surfaces to provide corrosion resistance and adhesion of subsequent coatings.
- 236**     **273**     **PRIMER:** A coating applied directly to substrate for any one or combination of the following purposes: corrosion prevention, protection from the environment, functional fluid resistance, or adhesion of subsequent coatings.
- 237**     **274**     **QUALITY CLASS Q:** ~~Any~~ A system, structure, coating or other component which, if defective or inoperable, could cause or increase the severity of a nuclear incident, thereby imposing undue risk to the health and safety of the public.
- 238**     **275**     **REFINISHING:** Recoating a used object's surface which arrives at the refinisher with a coating or with a previous coating worn away by use.
- 239**     **276**     **REPAIR COATING:** A coating ~~or coating operation~~ used to recoat the portion of a completed finish that suffered post-production damage at the facility where the finish was applied.
- 240**     **277**     **RESTRICTED SPRAY GUN:** ~~Any~~ An air-atomizing spray gun that is not a low pressure spray gun, and any other ~~coating gun~~ spray gun that is not on the list in ~~Section 303.1~~ Section 302 of this rule.
- 278**     **SHOCK-FREE COATING:** A coating applied to electrical components to protect the user from electric shock. The coating has characteristics of being of low capacitance and high resistance, and having resistance to breaking down under high voltage.
- 241**     **279**     **SILICONE RELEASE COATING:** ~~Any~~ A resin coating the major cured portion of which is silicone resin, having as its primary function the release of food products from metal surfaces such as baking pans.
- 242**     **280**     **SMALL SURFACE COATING SOURCE (SSCS):** A facility from which the total VOC emissions for all surface coating operations that are subject to this rule without, or prior to, any emission control, is less than 15 pounds (6.8 kg) per day and less than 2 tons (1814 kg) per year; as demonstrated by both adequate records of coating and diluent use (~~pursuant~~ according to ~~Section 501.2~~ 501.1 of this rule) and a separate tally of the number of days each month that such coating operations occur.
- 281**     **SOLAR-ABSORBENT COATING:** A coating with the prime purpose of absorption of solar radiation.
- 282**     **STENCIL COATING:** An ink or a coating which is rolled or brushed onto a template or stamp in order to add identifying letters, symbols and/or numbers.
- 243**     **283**     **STRIPPABLE BOOTH COATING:** A temporary coating that is applied to spray booth surfaces to receive the overspray and protect the surfaces, and which is designed to readily be pulled off the substrate in strips or sheets, and disposed of.
- 244**     **284**     **SURFACE COATING:** ~~Any~~ A liquid, fluid, or mastic composition which is converted to a solid (or semi-solid) protective, decorative, or adherent film or deposit after application as a thin layer. Surface coating is generally distinct and different from impregnation and from applying adhesive for bonding purposes.



- 245 **285** **SURFACE COATING OPERATION:** Preparation, handling, mixing, and application of surface coating, and cleanup of application-equipment and enclosures at a facility where surface coating is applied.
- 286** **SURFACE PREPARATION:** Surface preparation is the cleaning of a substrate to remove dirt, oils, and other contaminants prior to the application of surface coatings, or sealants.
- 287** **TEXTURE COATING:** A coating that is applied which, in its finished form, consists of discrete raised spots of the coating.
- 246 **288** **THREE-PIECE CAN SIDE-SEAM COAT COATING:** ~~Any~~ A coating sprayed onto the interior and/or exterior of a can body seam on a three-piece can to protect the exposed metal.
- 247 **289** **TOPCOAT:** The final, permanent, coating-formulation that completed the finish on a surface.
- 248 ~~TOTAL VOC VAPOR PRESSURE (VOC COMPOSITE PARTIAL PRESSURE): The sum of the partial pressures of the compounds defined as VOCs, calculated according to the formula in Section 504 of this rule.~~
- 249 **290** **TOUCH UP COATING:** A coating used to cover minor coating imperfections after the main coating operation. This includes touch-up coating that accompanies the purchase of an object already coated with that coating.
- 291** **TRANSFER EFFICIENCY:** The ratio of the weight of coating solids adhering to the part being coated to the weight of coating solids used in the application process expressed as a percentage.
- 250 **292** **TWO-PIECE CAN EXTERIOR END COAT COATING:** ~~Any~~ A coating applied to the exterior end of a can to provide protection to the metal.
- 293** **TWO-COMPONENT COATING:** A coating requiring the addition of a separate reactive resin, commonly known as a catalyst, before application to form an acceptable dry covering.
- 294** **VACUUM-METALIZING COATING:** The undercoat applied to the substrate on which the metal is deposited or the overcoat is applied directly to the metal film. Vacuum metalizing/ physical vapor deposition (PVD) is the process whereby the metal is vaporized and deposited in a substrate in a vacuum chamber.
- 251 **295** **VINYL COATING (COATING ON VINYL):** ~~Any~~ A decorative or protective coating or reinforcing coating applied over vinyl-coated textile fabric or vinyl sheets
- 252 ~~VOC BORNE COATING: A coating that contains more VOC than water, by weight.~~
- 253 ~~VOC BORNE DILUENT: A solvent or other diluent that contains more VOC than water, by weight~~
- 254.2 **296** **VOC ACTUAL: VOC CONTENT OF MATERIAL (MATERIAL VOC CONTENT)** VOC actual includes the VOC content minus the weight of water and minus the weight of exempt compounds divided by the total volume of all materials. Units of VOC actual are in pounds of VOC per gallon (or grams per liter) of material and shall be calculated using the following equation:

$$\text{VOC Content of Material Cleaners or Reducers} = \frac{W_s - W_w - W_{es}}{V_m}$$

Using consistently either English or metric measures in the calculations, where:

$W_s$  = weight of all volatile material in pounds (or grams) including VOC, water, non-precursor organic compounds and dissolved vapors

$W_w$  = weight of water in pounds (or grams)



$W_{es}$  = weight of all non-precursor organic compounds in pounds (or grams)

$V_m$  = volume of total material in gallons (or liters)

254 **297** **VOC CONTENT:** ~~In this rule, VOC content is determined by one of the following two formulas: To determine compliance with the VOC limits in Section 301, of this rule or the 2.0 lb VOC/gal threshold in Section 302 of this rule, use the following formula in Section 255.1. For other purposes, use the formula in Section 255.2: VOC content is the organic chemicals in a material that have a high vapor pressure at ordinary room temperature. The high vapor pressure results from a low boiling point, which causes large numbers of molecules to evaporate or sublimate from the liquid or solid form of the compound and enter the surrounding air. The term VOC content is a general term used throughout the rule and includes VOC actual or VOC regulatory.~~

254.1 **298** **VOC REGULATORY: VOC CONTENT MINUS EXEMPT COMPOUNDS** (is the same as **VOC CONTENT MINUS EXEMPT EVAPORATING COMPONENTS**) VOC regulatory includes the VOC content minus the weight of water and minus the weight of exempt compounds divided by the volume of material minus the volume of water and minus the volume of exempt compounds. Units of VOC regulatory are in pounds of VOC per gallon (or grams per liter) of material and shall be calculated using the following equation:

$$\text{VOC Content Minus Exempt Compounds VOC regulatory} = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Using consistently either English or metric measures in the calculations, where:

$W_s$  = weight of all volatile material in pounds (or grams), including VOC, water, non-precursor organic compounds and dissolved vapors

$W_w$  = weight of water in pounds (or grams)

$W_{es}$  = weight of all non-precursor organic compounds in pounds (or grams)

$V_m$  = volume of total material in gallons (or liters)

$V_w$  = volume of water in gallons (or liters)

$V_{es}$  = volume of all non-precursor organic compounds in gallons (or liters)

**SECTION 300 – STANDARDS**

**301 SURFACE COATINGS:** ~~A person~~ An owner or operator shall comply with one of the following for all applications of surface coatings:

**301.1** Meet the limits in ~~Table 4~~ Tables 336-1 through 336-7 of this rule. Coating limits are VOC Regulatory; or

**301.2** Operate an Emission Control System (ECS) in accordance with ~~subsection 306.1~~ Section 305 of this rule when applying a coating that exceeds the VOC limits in ~~Table 4~~ Tables 336-1 through 336-7 of this rule; or

**301.3** Qualify for an exemption under ~~Section 305~~ Sections 103 or 104 of this rule.

**TABLE 4**

<b>SURFACE COATING EMISSION LIMITS</b>	
<b>TYPE OF SURFACE COATING</b>	<b>LIMITS AS APPLIED:</b> VOC content minus exempt compounds (see subsection 255.1)



Column I	Column II	
	lbs/gal	g/liter
Can Coating		
Sheet Basecoat (Exterior and Interior) and Overvarnish	2.8	340
Two Piece Can Exterior (Basecoat and Overvarnish)	2.8	340
Two and Three Piece Can Interior Body Spray	4.2	510
Two Piece Can Exterior End (Spray or Roll Coat)	4.2	510
Three Piece Can Side Seam Spray	5.5	660
End Sealing Compound	3.7	440
Can Printing Ink	2.5	300
Coil Coating (any coat)	2.6	310
Metal Furniture Coating	3.0	360
Large Appliance Coating	2.8	340
<b>OTHER METAL PARTS AND PRODUCTS COATING (As defined in Section 231)</b>		
The following includes Non-adhesive Coating, Adhesive, Adhesive Primer, Caulking, and Beaded Sealants:		
Air Dried Coating	3.5	420
Baked Coating [above 200°F (93°C)]	3.0	360
Silicone Release Coating: Baked or Air Dried	3.5	420
Fabric Coating	2.9	350
Film Coating	2.9	350
<b>COATING PLASTIC PARTS AND PRODUCTS THAT ARE NOT DEFINED AS FLEXIBLE</b>	3.5	420
<b>COATING FLEXIBLE PLASTIC PARTS AND PRODUCTS</b>		
Primer	4.1	490
Color Topcoat	3.8	450
Basecoat/Clear Coat (Combined System) – Limit for either coat	4.5	540
Paper Coating, including Adhesives	2.9	350
Vinyl Coating (Coating on Vinyl)	3.8	450
<b>STRIPPABLE BOOTH COATINGS</b>	2.0	240

**Table 336-1: Coating Limits For Metal Parts and Products**

Coating Category	Air Dried		Baked	
	g VOC/l	lb VOC/gal	g VOC/l	lb VOC/gal
One-Component	340	2.8	280	2.3
Multi-Component	340	2.8	280	2.3
Camouflage	420	3.5	420	3.5
Electric-Insulating Varnish	420	3.5	420	3.5
Etching Filler	420	3.5	420	3.5
Extreme High-Gloss	420	3.5	360	3.0
Extreme Performance	420	3.5	360	3.0
Heat-Resistant	420	3.5	360	3.0
High Performance Architectural	740	6.2	740	6.2
High Temperature	420	3.5	420	3.5
Metallic	420	3.5	420	3.5
Military Specification	340	2.8	280	2.3
Mold-Seal	420	3.5	420	3.5
Pan Backing	420	3.5	420	3.5
Prefabricated Architectural Multi-Component	420	3.5	280	2.3
Prefabricated Architectural One-Component	0.42	3.5	280	2.3
Pretreatment Coating	420	3.5	420	3.5



<u>Coating Category</u>	<u>Air Dried</u>		<u>Baked</u>	
	<u>g VOC/l</u>	<u>lb VOC/gal</u>	<u>g VOC/l</u>	<u>lb VOC/gal</u>
<u>Repair</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>
<u>Touch up</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>
<u>Silicone Release</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Solar-Absorbent</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>
<u>Vacuum-Metalizing</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Drum Coating, New, Exterior</u>	<u>340</u>	<u>2.8</u>	<u>0.34</u>	<u>2.8</u>
<u>Drum Coating, New, Interior</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Drum Coating, Reconditioned, Exterior</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Drum Coating, Reconditioned, Interior</u>	<u>500</u>	<u>4.2</u>	<u>500</u>	<u>4.2</u>

**Table 336-2: Coating Limits For Can and Coil Coating**

<u>Coating Category</u>	<u>g VOC/l</u>	<u>lb VOC/gal</u>
<u>Can Coating</u>		
<u>Sheet Basecoat (Exterior and Interior) and Overvarnish</u>	<u>340</u>	<u>2.8</u>
<u>Two-Piece Can Exterior (Basecoat and Overvarnish)</u>	<u>340</u>	<u>2.8</u>
<u>Two and Three-Piece Can Interior Body Spray</u>	<u>510</u>	<u>4.2</u>
<u>Two-Piece Can Exterior End (Spray or Roll Coat)</u>	<u>510</u>	<u>4.2</u>
<u>Three-Piece Can Side-Seam Spray</u>	<u>660</u>	<u>5.5</u>
<u>End Sealing Compound</u>	<u>440</u>	<u>3.7</u>
<u>Can Printing Ink</u>	<u>300</u>	<u>2.5</u>
<u>Coil Coating (any coat)</u>	<u>310</u>	<u>2.6</u>
<u>Fabric Coating</u>	<u>350</u>	<u>2.9</u>
<u>Film Coating</u>	<u>350</u>	<u>2.9</u>

**Table 336-3: Coating Limits For Plastic Parts and Products**

<u>Coating Category</u>	<u>g VOC/l</u>	<u>lb VOC/gal</u>
<u>One-Component</u>	<u>280</u>	<u>2.3</u>
<u>Multi-Component</u>	<u>420</u>	<u>3.5</u>
<u>Electric Dissipating Coatings and Shock-Free Coatings</u>	<u>800</u>	<u>6.7</u>
<u>Extreme Performance</u>	<u>420</u> <u>(2-pack coatings)</u>	<u>3.5</u> <u>(2-pack coatings)</u>
<u>Metallic</u>	<u>420</u>	<u>3.5</u>
<u>Military Specification</u>	<u>340 (1 pack)</u> <u>420 (2 pack)</u>	<u>2.8 (1 pack)</u> <u>3.5 (2 pack)</u>
<u>Mold-Seal</u>	<u>760</u>	<u>6.3</u>
<u>Multi-Colored Coating</u>	<u>680</u>	<u>5.7</u>
<u>Optical Coatings</u>	<u>800</u>	<u>6.7</u>
<u>Vacuum-Metalizing</u>	<u>800</u>	<u>6.7</u>

**Table 336-4: Coating Limits For Business Machine Coatings**

<u>Coating Category</u>	<u>g VOC/l</u>	<u>lb VOC/gal</u>
<u>Primer</u>	<u>350</u>	<u>2.9</u>
<u>Topcoat</u>	<u>350</u>	<u>2.9</u>
<u>Texture Coating</u>	<u>350</u>	<u>2.9</u>
<u>Fog Coat</u>	<u>260</u>	<u>2.2</u>
<u>Touchup</u>	<u>350</u>	<u>2.9</u>
<u>Repair</u>	<u>350</u>	<u>2.9</u>



**Table 336-5: Coating Limits For Metal Furniture and Large Appliance Coatings**

<u>Coating Category</u>	<u>Air Dried</u>		<u>Baked</u>	
	<u>g VOC/l</u>	<u>lb VOC/gal</u>	<u>g VOC/l</u>	<u>lb VOC/gal</u>
<u>One-Component</u>	<u>275</u>	<u>2.3</u>	<u>275</u>	<u>2.3</u>
<u>Multi-Component</u>	<u>340</u>	<u>2.8</u>	<u>275</u>	<u>2.3</u>
<u>Extreme High Gloss</u>	<u>340</u>	<u>2.8</u>	<u>360</u>	<u>3.0</u>
<u>Extreme Performance</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>
<u>Heat Resistant</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>
<u>Large Appliances</u>	<u>275</u>	<u>2.3</u>	<u>275</u>	<u>2.3</u>
<u>Metallic</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Pretreatment Coating</u>	<u>420</u>	<u>3.5</u>	<u>420</u>	<u>3.5</u>
<u>Refrigerated glass door coatings</u>	<u>--</u>	<u>--</u>	<u>480</u>	<u>4.0</u>
<u>Solar Absorbent</u>	<u>420</u>	<u>3.5</u>	<u>360</u>	<u>3.0</u>

**Table 336-6: Coating Limits For Paper, Film, and Foil Surface Coating**

<u>Coating Category</u>	<u>kg/VOC/kg Coating (lb VOC/lb solids)</u>	<u>kg VOC/kg Solids (lb VOC/lb solids)</u>
<u>Pressure Sensitive Tape and Label Surface Coating</u>	<u>0.067</u>	<u>0.20</u>
<u>Paper, Film, and Foil Surface Coating (Not including Pressure Sensitive Tape and Label)</u>	<u>0.08</u>	<u>0.40</u>

**Table 336-7: Coating Limits For Pleasure Craft Surface Coating**

<u>Coating Category</u>	<u>g VOC/l</u>	<u>lbs VOC/gal</u>
<u>Extreme High Gloss Topcoat</u>	<u>600</u>	<u>5.2</u>
<u>High Gloss Topcoat</u>	<u>420</u>	<u>3.5</u>
<u>Pretreatment Wash Primer</u>	<u>780</u>	<u>6.5</u>
<u>Finish Primer/Surfacer</u>	<u>600</u>	<u>5.2</u>
<u>High Build Primer/Surfacer</u>	<u>340</u>	<u>2.8</u>
<u>Aluminum Substrate Anti-foulant Coating</u>	<u>560</u>	<u>4.7</u>
<u>Other Substrate Anti-foulant Coating</u>	<u>400</u>	<u>3.4</u>
<u>All other Pleasure craft surface coatings for metal or plastic</u>	<u>420</u>	<u>3.5</u>
<u>Antifouling Sealer/Tie Coat</u>	<u>420</u>	<u>3.5</u>

**302 APPLICATION METHODS FOR SURFACE COATINGS:**

**302.1** ~~A person~~ An owner or operator shall ~~employ~~ use one of the following methods for all applications of surface coating containing more than 2 pounds of VOC per gallon (240 g/L) ~~minus exempt compounds~~ VOC regulatory:

- 302.1 **a.** Low Pressure Spray Gun; or
- 302.2 **b.** Electrostatic System; or
- 302.3 **c.** A system that atomizes principally by hydraulic pressure, including “airless” and “air assisted airless”; or
- 302.4 **d.** High-Volume, Low Pressure (HVLP) Spray-Gun that meets the definition of HVLP in this rule; or
  - e.** Flow Coat, or
  - f.** Roll Coat, or
  - g.** Dip-Coat; or



- h.** Hand Application Methods; or
- 302.5 **i.** An Alternative Application Method: Any method approved by the Administrator of the Federal EPA or the Control Officer as having a which achieves a transfer efficiency of greater than or equal to 65% ~~or greater~~ as demonstrated by the following:
- (1) In accordance with the provisions of Section 504.1(d) of this rule; or
  - (2) As stamped on the gun by the manufacturer; or
  - (3) From testing documentation of the HVLP spray-gun status provided by the manufacturer.
- 302.2** An owner or operator is allowed to use a device or system other than that described in Section 302.1 of this rule for applications of surface coating containing less than 2.0 lb VOC/gal (250 g/l).
- 303 CLEANUP OF APPLICATION EQUIPMENT:** ~~A person~~ An owner or operator shall comply with the following when using VOC-containing material to clean application equipment:
- 303.1 ~~Disassemble any spray gun and other application equipment and clean it in:~~
- a. ~~A container which remains covered at all times, except when the application equipment is being handled in the container, or transferred into or out of the container; or~~
  - b. ~~A commercially sold gun cleaning machine which shall be operated and maintained as stipulated in the Air Pollution Permit's Operation and Maintenance (O&M) Plan, or in the absence of its mention in the O&M Plan, according to manufacturer's or distributor's instructions.~~
- 303.2 ~~Vapor Pressure Limits: Any person subject to this rule using VOC solvent to clean coating application equipment shall use only solvent which, as used, has a VOC vapor pressure below 35 mm Hg at 20° C (68° F), except for sprayless equipment exempted pursuant to subsection~~
- 303.1 Spray-Gun Cleaning Requirements:**
- a. An owner or operator subject to this rule shall clean spray-guns without spraying or atomizing a solvent cleaner with the gun.
  - b. **Spray-Gun Cleaning Machine:** An owner or operator subject to this rule shall use a spray-gun cleaning machine that complies with the following requirements unless the owner or operator complies with the manual spray-gun cleaning requirements in Section 303.2 of this rule.
    - (1) **Spray-Gun Cleaning Machine-General Requirements:** The spray-gun cleaning machine shall meet all of the following requirements:
      - (a) Be designed to clean spray-guns.
      - (b) Have at least one pump which drives solvent cleaner through and over the spray-gun.
      - (c) Have a basin which permits containment of the solvent cleaner.
      - (d) Be kept in proper repair and free from liquid leaks.
      - (e) Shall be fitted with a cover.
      - (f) Be located on-site where the spray application occurs.
      - (g) Shall be operated and maintained as stipulated in the Air Pollution Permit's Operation and Maintenance (O&M) Plan and according to manufacturer's or distributor's instructions.
    - (2) **Automatic Spray-Gun Cleaning Machine:** An automatic spray-gun cleaning machine shall meet all of the following requirements:
      - (a) Be self-covering or enclosing when not loading or unloading.



**(b)** Have a self-closing cover or other self-enclosing feature which in the cover's closed position allows no gaps exceeding 1/8 inch (3 mm) between the cover and the cabinet. This self-enclosing feature shall be maintained and consistently completely covered or enclosed to these gap limits.

**(3) Non-Automatic Remote Reservoir Spray-Gun Cleaning Machine:** A non-automatic remote reservoir spray-gun cleaning machine shall meet all of the following requirements:

**(a)** Drain solvent cleaner from the sink/work-space quickly into a remote reservoir when work-space is not in use.

**(b)** Have the machine reservoir ability to contain VOC vapors and not have a cumulative total opening, including the drain opening(s), allowing VOC-escape to the atmosphere exceeding two square inches in area.

**(c)** Allow a machine design in which the base of the sink/work-space functions as the reservoir's top surface, as long as the fit/seal between sink base and reservoir container allows the reservoir to meet the opening limits specified in Section 303.1(b)(3)(b) of this rule.

**303.2 Manual Spray-Gun Cleaning Requirements:** An owner or operator manually cleaning spray-guns shall comply with the following requirements:

**a.** Disassembled spray-guns must be cleaned by hand which consists of application of cleaners by non-mechanical, hand-held equipment including but not limited to paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags, and sponges;

**b.** Disassembled spray-guns must be soaked in a vat which remains covered at all times, except when the application equipment is being handled in the container, or transferred into or out of the container;

**c.** Solvent cleaners used to clean spray-guns shall be less than 10 percent VOC (excluding water and non-precursor organic compounds) and shall contain less than 8.0 percent VOC by weight (including water and non-precursor organic compounds) and calculated pursuant to VOC Regulatory as defined in this rule.

**304 WORK PRACTICES-HANDLING, DISPOSAL AND STORAGE OF VOC-CONTAINING MATERIAL:** An owner or operator of any surface coating or pleasure craft facility shall store, handle, and dispose of VOC or VOC-containing material in a way to prevent the evaporation of VOC to the atmosphere. Work practices limiting VOC emissions include but are not limited to the following:

**304.1 Use and Storage:** An owner or operator shall cover and keep covered each VOC-containing material which is not currently in use. A person shall store finishing and cleaning materials in closed or covered leak-free containers.

**304.2 Disposal of VOC-Containing Material:** An owner or operator shall store all VOC-containing materials intended for disposal including, but not limited to, rags, waste coatings, waste brushes, waste rollers, waste applicators, waste solvents, and their residues, in closed, leakfree containers which are legibly labeled with their contents and which remain covered when not in use.

**304.3** Minimize spills of VOC-containing coatings, thinners, and coating-related waste materials; and

**304.4** Convey VOC-containing coatings, thinners, and coating-related waste materials from one location to another in closed containers or pipes.

**304.5 Surface Preparation:** Limits and work practices for surface preparations include the following:

**a.** An owner or operator cleaning or preparing a surface for coating using a wipe method or other non-dip method shall use a material with a VOC content less than 1.4 lb. VOC per gallon (168 g/l) which shall be calculated according to Section 297.2 of this rule.

**b.** Surface preparations containing VOC shall not be applied in a mist or atomized spray.



- c. Dip Cleaning:** Refer to Rule 331 (Solvent Cleaning) of these rules for dip cleaning requirements.

305 **EXEMPTIONS:**

305.1 **Categorical Exemptions:** This rule does not apply to the following operations:

- a. ~~Aerospace coating operations (Rule 348).~~
- b. ~~Architectural coating, including buildings and erected structures (Rule 335).~~
- c. ~~Cleaning: VOC loss from cleaning or stripping a surface for coating or other purpose is regulated by Rule 331.~~
- d. ~~Marine vessel exterior refinishing.~~
- e. ~~Polyester coatings applied to polyester composites.~~
- f. ~~Printing and graphic arts coating (Rule 337).~~
- g. ~~Semiconductor manufacturing (Rule 338).~~
- h. ~~Coating a highway vehicle or mobile equipment (Rule 345).~~
- i. ~~Wood: Coating Wood Furniture (Rule 342); Coating Wood Millwork (Rule 346).~~

305.2 **Exemptions for Qualified Materials:** Rule 336 does not apply to the following materials that meet the specific qualification(s) and limitation(s) set forth herein:

- a. ~~Leak Preventing Materials: Sealants, adhesives, caulking, and similar materials used on the following substrates for the primary purpose of leak prevention are exempt from this rule:~~
  - (1) ~~Non-metallic substrates; and~~
  - (2) ~~Used substrates, post manufacture, such as, but not limited to, old joints and seals on pipe and valve assemblies.~~
- b. ~~Adhesive Use:~~
  - (1) ~~Adhesive and adhesive primer applications are exempt from this rule, except for the 2 categories that appear in Table 1, namely adhesive materials applied to other metal parts and products (as defined in Section 231), and adhesives used in paper coating (as defined in Section 233).~~
  - (2) ~~Any adhesive exempted by this Rule 336 and to which no other rule in Regulation III specifically applies shall comply with the provisions of Rule 330 (Volatile Organic Compounds) of these Rules & Regulations.~~
- c. ~~Certain Joint Fillers: Caulking and beaded sealants used to fill gaps or to fill joints between surfaces are exempt from this rule, except those used in manufacturing other metal parts and products as defined in Section 231 of this rule, or in the manufacturing of cans.~~
- d. ~~Extreme Performance Coatings: Extreme performance coatings are exempt from the VOC limits of Table 1 when used under the following conditions:~~
  - (1) ~~Used on internal combustion engine components that are normally above 250°F (121°C) during use; or~~
  - (2) ~~Used at temperatures above 250°F (121°C) on items that are both included under SIC (Standard Industrial Classification, 1987) codes 3661, 3663, 3669, 3677, 3678, 3679, or 3769 and are electronic products in space vehicles and/or are communications equipment. The US Government Printing Office “Standard Industrial Classification Manual, 1987” (and no future editions) is incorporated by reference and is on file at the Maricopa County Air Quality Department, 1001 N. Central Ave., Phoenix, Arizona 85004.~~



**AQ-2015-005-Draft Rule 336**

Stakeholder Workshop: Thursday, February 18, 2016  
Contact: Kathleen Sommer – 602-506-6706  
[kathleensommer@mail.maricopa.gov](mailto:kathleensommer@mail.maricopa.gov)

**Maricopa County Air Quality Dept.**

Planning & Analysis Division  
1001 N. Central Ave. Ste. 125  
Phoenix, AZ 85004

- 305.3 ~~ECS Use In Lieu Of Equipment/Practice: In lieu of meeting an equipment or work practice standard within Sections 302, 303, or 304, an owner or operator is allowed to instead use an ECS that has a capture efficiency not less than 90% and meets all ECS requirements in Section 306.~~
- 305.4 ~~Spray Gun And VOC Limit Exemptions: The following are exempt from subsection 301.1, subsection 301.2, and Section 302 of this rule:~~
- a. ~~Coating with an aerosol can.~~
  - b. ~~Touch up or repair coating operations as defined in Sections 250 and 240.~~
  - c. ~~Low usage coatings which in aggregate of all formulations do not exceed 55 gallons (208 liters) per year facility wide if the operator updates usage records of these coatings on each day of their use, pursuant to subsection 501.2.~~
  - d. ~~A small surface coating source (SSCS) as defined in Section 243. However, once a small surface coating source exceeds either the 15 lb per day or the 2 tons per year limits that are required to maintain SSCS status that facility is permanently subject to the limits of subsection 301.1, subsection 301.2, and Section 302, with the following exception:~~
    - (1) ~~For such a facility that does not have either a 15 lb/day or a 2 ton/year VOC emission limit in an Air Pollution Permit for processes regulated by this rule, an owner or operator may retain the exemption if s/he agrees in writing to enforceable permit conditions that establish these or stricter limits.~~
    - (2) ~~However, a facility that violates its permit limit of either 15 lbs VOC/day or 2 tons VOC/yr. for coating process regulated by this Rule 336 is permanently subject to the limits of subsections 301.1 and 301.2, and Section 302.~~
  - e. ~~A Quality Class Q protective coating that is used on equipment, structures, and/or components within a containment facility of a nuclear power plant and is approved in accordance with either ANSI standards N101.2 and N101.4 or with ASTM Standards D3911 and D3843.~~
  - f. ~~A tactical military equipment coating that is approved in a Maricopa County Air Pollution Permit subsequent to a sufficient demonstration by the user that no compliant substitute exists.~~
- 305.5 ~~Special Facilities/Operations:~~
- a. ~~Silicone Release Coatings: Silicone release coating operations controlled by an ECS pursuant to subsection 301.2 are exempt from the 85 percent overall control efficiency requirement if the ECS demonstrates at least 70 percent overall control and the coating is applied with a liquid seal air spray system.~~
  - b. ~~Bonding Impact Resistant Rubber Lining To Metal: An adhesive and an adhesive primer are exempt from Table 1 limits, but shall not have a VOC content of material exceeding 850 grams of VOC per liter (7.1 lb/gal), if such adhesive is used to bond sheets/strips of rubber to metal equipment so that such rubber sheathing directly contacts material received by the metal and so protects the metal. This exception does not apply to any other situations where adhesives are used to bond rubber to metal.~~
- 305.6 ~~Exemption Of Coating Applicator Cleanup: A person is allowed to use solvent that has at 20° C (68° F) a total VOC vapor pressure above 35 mm Hg for cleaning coating application equipment, but only if such application equipment does not use spray devices and the same principal solvent is used for cleaning as is used in the coating.~~
- 305.7 ~~Low Usage Allowance for Restricted Guns: A person may employ spray guns otherwise prohibited by Section 302 for use with coatings over 2 lb VOC /gal under the following limited conditions:~~
- a. ~~If VOC emissions from the finishing application station, are captured and directed to an ECS complying with the provisions of Section 306.~~
  - b. ~~To coat the inside of pipes and tubes with a wand style applicator.~~
  - c. ~~Using an airbrush or other small gun that has a reservoir capacity not exceeding 250 cc (8.8 fluid ounces) and is used solely for detailing, lettering, touchup, and/or repair.~~



306 **305** REQUIREMENTS FOR AIR POLLUTION CONTROL EQUIPMENT AND EMISSION CONTROL SYSTEM (ECS) MONITORING EQUIPMENT REQUIREMENTS:

- 306.1 **305.1 ECS Control Efficiencies:** To meet the requirements pursuant to ~~subsection 301.2, subsection 305.3, or subsection 305.7,~~ Section 301.2 of this rule, an ECS shall be operated as follows:
- a. **Overall ECS Efficiency:** ~~Overall, the~~ The ECS shall prevent at least ~~85%~~ 90% of the mass of the VOC emitted by each coating or process ~~so controlled~~ from entering the atmosphere except as ~~successfully~~ those controlled pursuant to the alternative in ~~subsection 306.1c(2),~~ Section 305.1(c)(2) of this rule.
  - b. **Capture Efficiencies Efficiency:**
    - (1) For an ECS used pursuant to ~~subsection 301.2 and/or subsection 305.7~~ Section 301.2 of this rule, capture shall be at least ~~87%~~ 90%.
    - (2) For an ECS used pursuant to ~~subsection 305.3,~~ capture shall be at least 90%.
  - c. **Control Efficiency of The Emissions Processing Subsystem:**
    - (1) ~~The emissions processing subsystem of the~~ The ECS shall reduce the mass of VOC entering it by at least 90 percent; or
    - (2) **Alternative for Very Dilute Input:** For VOC input-concentrations of less than 100 ppm (as carbon) at the inlet of the ECS emissions processing subsystem, an ECS' VOC processing subsystem also satisfies the processor efficiency requirements of this rule if:
      - (a) The VOC output is consistently less than 20 mg VOC/~~M3~~ m<sup>3</sup> (as carbon) adjusted to standard conditions; and
      - (b) The ECS consistently shows an overall control efficiency of at least ~~85%~~ 90% when tested pursuant to ~~subsection 503.3~~ Section 504.1(b) of this rule, at VOC input-concentrations exceeding 100 ppm (as carbon).
  - d. ~~Coating that exceeds the applicable VOC limits in Table 1~~ All VOC coatings used that are in excess of the VOC limits in Tables 336-1 through 336-7 of this rule shall be clearly identified such that coating-operators are informed that an ECS must be used.
- 306.2 **305.2 Operation and Maintenance (O&M) Plan Required for ECS:**
- a. An owner or operator shall provide and maintain (an) O&M Plan(s) for any ECS, any other emission processing equipment, and any ECS monitoring devices that are used pursuant to this ~~Rule 336 rule~~ rule or to an air pollution control permit.
  - b. The owner or operator shall submit to the Control Officer for approval the O&M Plans of each ECS and each ECS monitoring device that is used pursuant to this ~~Rule 336 rule.~~ rule.
  - c. The owner or operator shall comply with all the identified actions and schedules provided in each O&M Plan.
- 306.3 **305.3 Providing and Maintaining ECS Monitoring Devices:** Any ~~person~~ owner or operator incinerating, adsorbing, or otherwise processing VOC emissions pursuant to this rule shall provide, properly install and maintain in calibration, in good working order and in operation, devices described in the facility's O&M Plan that indicate temperatures, pressures, rates of flow, or other operating conditions necessary to determine if air pollution control equipment is functioning properly and is properly maintained. Records shall be kept pursuant to Section 502 which demonstrate that the ECS meets the overall control standard required by ~~subsection 306.1,~~ Section 305.1 of this rule.
- 306.4 **305.4 O&M Plan Responsibility:** An owner or operator of a facility that is required to have an O&M Plan pursuant to ~~subsection 306.2~~ Section 305.2 must fully comply with all O&M Plans that the owner or operator has submitted for approval, but which have not yet been approved, unless notified otherwise by the Control Officer in writing. If revisions to the plan have been submitted and not yet been approved by the Control Officer, then an owner or operator shall comply with the most recent O&M plan on file at Maricopa County Air Quality Department.



### **305.5 Operation and Maintenance (O&M) Plan Contents For an ECS:**

- a.** An O&M Plan for any ECS including any ECS monitoring devices shall include all of the following information:
  - (1)** ECS equipment manufacturer;
  - (2)** ECS equipment model;
  - (3)** ECS equipment identification number or identifier that owner or operator subject to this rule assigns to such ECS equipment when manufacturer's equipment identification number is unknown.; and
  - (4)** Information required by Section 501 of this rule.
- b.** **Control Officer Modifications to Plan:** After discussion with the owner or operator, the Control Officer may modify the plan in writing prior to approval of the initial O&M Plan. An owner or operator shall then comply with the plan that has been modified.
- c.** **Deficient Plan:** The owner or operator subject to this rule, who receives a written notice from the Control Officer that the O&M Plan is deficient or inadequate, must make written revisions to the O&M Plan for any ECS including any ECS monitoring devices and must submit such revised O&M Plan to the Control Officer within five working days of receipt of the Control Officer's written notice, unless such time period is extended by the Control Officer, upon written request, for good cause. During the time that such owner or operator subject to this rule is preparing revisions to the O&M Plan, such owner or operator shall still comply with all requirement of this rule.

## **SECTION 400 – ADMINISTRATIVE REQUIREMENTS**

### **401 COMPLIANCE SCHEDULE VOC LIMITS:**

**401.1 Emission Control System (ECS):** ~~By August 1, 1999 :~~ Any owner or operator intending to install an ECS in a facility to comply with requirements of this rule shall:

- a.** ~~Have implemented All all new recordkeeping provisions shall be in effect,~~ including ~~subsections 501.1c and 501.2a~~ Sections 501.1(c) and 501.2(a) of this rule.
- b.** ~~Announce the~~ The intention to use an Emission Control System ( ECS ) shall be announced to the Control Officer in writing if:
  - (1)** The ECS is used as an alternative to meeting the spray-gun provisions of Section 302 of this rule; or
  - (2)** The ECS is used as an alternative to meeting the gun cleaning machine provisions of Section 303 of this rule.

**401.3 c.** By [one year after rule adoption] , the ECS announced pursuant to Section 401.1(b) shall be in continuous use.

**401.2** ~~Spray Guns: By November 1, 1999 – , the following shall be in continuing use:~~

- ~~a. Spray guns required pursuant to Section 302;~~
- ~~b. Cleaning solvent(s) having the required vapor pressure pursuant to Section 303, and the data sheet(s) confirming the vapor pressure.~~

**401.3** ~~By May 1, 2000, the ECS announced pursuant to subsection 401.1b shall be in continuing use.~~

**401.2 VOC limits and Rule Requirements:** Upon [date of adoption of this rule], owner or operators subject to this rule shall discontinue purchase of materials that are non-compliant with Section 301.1 of this rule. The owners or operators have up to [date 6 months after rule adoption] to complete use of existing non-compliant materials that have already been purchased. A schedule for achieving compliant use of materials shall be prepared and made available to an inspector upon request. This schedule shall specify that after [date 6 months after rule adoption] complete material compliance shall be achieved.



#### 402 **COMPLIANCE SCHEDULE O&M PLAN:**

- 402.1** The owner or operator of an existing facility shall revise/update all O&M Plans by [date 3 months after rule adoption].
- 402.2** The Control Officer shall take final action on an O&M Plan revision/update to address the newly amended provisions of this rule within 30 calendar days of the filing of the complete O&M Plan revision/update. The Control Officer shall notify the applicant in writing of his approval or denial.

#### SECTION 500 – MONITORING AND RECORDS

**501 RECORDKEEPING AND REPORTING:** ~~Any person~~ Any owner or operator subject to this rule shall comply with the following requirements ~~of subsections 501.1 and 501.2~~ that apply to materials regulated by this rule. Records shall be retained for 5 years and shall be made available to the Control Officer upon request.

##### **501.1 Current Lists:**

- a. ~~Maintain a current list of coatings, adhesives, reducers, thinners, gun cleaning materials, additives, and any or any other VOC-containing materials regulated by this rule; this includes a list of give the VOC content of material for each as received (before thinning). A complete, neat assemblage of this data meets the requirements for a list.~~

Express VOC content in 1 of 3 forms:

- (1) ~~pounds~~ Pounds VOC per gallon; ~~;~~
- (2) ~~grams~~ Grams VOC per liter; ~~;~~ or
- (3) The percent VOC by weight along with the specific gravity or density, (2 numbers are required).

- b. **Less Stringent Recordkeeping for Consistently Low Users:** An owner or operator of a facility that ~~always~~ uses less than 2 gallons per day total of thinner and coating (~~listed in Table 4~~), and meets the listing and recording requirements of subsections Sections 501.1(a), 501.1(c), and 501.2 of this rule if:

- (1) All purchase receipts/invoices of VOC-containing material that is regulated by this rule for the most recent 12 months are kept together; and
- (2) Current data sheets show the VOC content of material for every VOC containing substance currently used that is regulated by this rule.

- c. **Facilities That Are Not Small Surface-Coating Sources:** Facilities that are not small surface-coating sources shall ~~do the following::~~ Coatings: For for all coatings (except those recorded under the subsection 305.4(e) Section 103.6(c) low usage allowance), make the following listings for coatings and adhesives that have VOC limits listed in Table 4 Tables 336-1 through 336-7 of this rule:

- (a) **(1) VOC Before Reducing:** The VOC content of each coating as received, minus exempt compounds. (This figure is sometimes called the “EPA Method 24” VOC content on manufacturer’s data sheets). If the coating is a multi-part coating, list the VOC content which the manufacturer states the coating will have once you have mixed all the necessary parts together in the proportions specified by the manufacturer.
- (b) **(2) List Maximum VOC Content of Coating As Applied:** For each coating that you thin/reduce or add any additive to, record in a permanent log either of the following:
  - (a) The maximum number of fluid ounces thinner/reducer that you ever add to a gallon of unreduced coating (or maximum g/liter), and the maximum fluid ounces of every other additive you mix into a gallon of the coating; or



- (ii) **(b)** The VOC content of the coating, after adding the maximum amount of thinner/reducer and other additives that you would ever add, as determined by the formula in ~~subsection 255.1~~ the definition of VOC Regulatory in this rule.

**d. Aerosol Spray Cans:** Maintain purchase records for aerosol spray-cans, including VOC content of can contents.

- (2) ~~Applicator Cleanup Solvent: Have a hardcopy of the VOC vapor pressure (VP) at 20°C (68°F) of solvent(s) used to clean spray guns, hoses, reservoirs, and any other coating application equipment. Any one of the following ways of providing the VP data is sufficient:~~

- (a) A current manufacturer's technical data sheet;
- (b) A current manufacturer's safety data sheet (MSDS);
- (c) Actual test results; or
- (d) A letter signed by an official or lab manager of the supplying facility.

**501.2 Frequency of Updating Usage Records:** Update your records, showing the type and amount used of each VOC-containing coating ~~or adhesive~~ which is regulated by name or type in ~~Table 1~~ Tables 336-1 through 336-7 of this rule, and update each VOC-containing material, related to surface coating, that is not addressed by ~~Table 1~~ these tables. This includes, but is not limited to, thinners, surfacers, and diluents. Maintain records according to the following schedule:

- a. Small Surface-Coating Sources:** Small surface-coating sources shall update each month's records of coating use by the end of the following month.

- b. All Other Sources:** For a source that does not meet the definition of small surface-coating source, update records monthly for each coating used that complies with the VOC limits in Tables 336-1 through 336-7 of this rule. Complete a month's update by the end of the following month.

- (1) ~~Monthly: Monthly update records of each coating used that complies with the VOC limits in Table 1. Complete a month's update by the end of the following month.~~

- (2) ~~Daily: Daily update the usage of each coating that exceeds its limits in Table 1, including coating exempted by subsection 305.4c.~~

**501.3 Grouping By VOC Content:** For purposes of recording usage, ~~coatings and adhesives that are in the same category in Table 1, and have similar VOC content, may be recorded under a name that includes the category name.~~ The highest VOC content among the members of that grouping shall be assigned to that grouping, rounded to the nearest 10th of a pound. To identify what products belong within each group, after each group name and the group's VOC content of material must appear the name of each product in the group and its VOC content of material. **For example:** For flexible plastic parts, you use 20 gallons of primer that has 3.04 lb VOC/gal., 30 gallons of primer having 3.14 lb VOC/gal., and 40 gallons of primer having 2.89 lb VOC/gal. You may record usage as 90 gallons of flexible plastic primer containing 3.1 lb VOC/gal. If grams VOC per liter is used to record VOC content, round off to the nearest whole number of grams.

**502 ECS RECORDING REQUIREMENTS:**

**502.1** On each day an ECS is used at a facility pursuant to this rule, an owner or operator of the facility shall:

- a.** Record the amount and VOC content of coating, the amount of catalyst/hardener, and the amounts of solvent, reducer, and diluent used that were subject to ECS control pursuant to this Rule; and
- b.** Make a permanent record of the operating parameters of the key systems as required by the O&M Plan; and



- c. Make a permanent record of the maintenance actions taken, within 24 hours of the action's completion, for each day or period in which the O&M Plan requires that maintenance be done.

**502.2.** An explanation shall be entered for scheduled maintenance that is not performed during the period designated for it in the O&M Plan.

**503** **O&M PLAN RECORDS:** An owner or operator of a facility shall maintain all of the following records in accordance with an approved O&M Plan for any ECS, that is used pursuant to this rule or to an Air Pollution Control Permit:

**503.1** Periods of time that an approved ECS is operating to comply with this rule;

**503.2** Periods of time that an approved ECS is not operating;

**503.3** Flow rates;

**503.4** Pressure drops;

**503.5** Other conditions necessary to determine if the approved ECS is functioning properly;

**503.6** Results of visual inspections; and

**503.7** Correction action taken, if necessary.

**503** **504** **COMPLIANCE DETERMINATION AND TEST METHODS:** When more than one test method is permitted for a determination, an exceedance of the limits established in the rule determined by any of the applicable test methods constitutes a violation of this rule.

**503-1** **504.1** **Compliance Determination:** The following means shall be used to determine compliance with this rule:

- a. Measurement of VOC content of materials subject to Section 301 or Section 302 of this rule shall be conducted and reported using one of the following means:

(1) VOC content of coatings, solvents, and other substances having less than 5% solids will be determined by the test method in ~~subsection 503.2f~~ Sections 504.2(f) of this rule (BAAQMD Method 31 [April 15, 1992]) or ~~503.2g~~ 504.2(g) (SCAQMD Method 313-91 [April 1997]) of this rule.

(2) The VOC content of coatings or other materials having 5% or more solids will be determined by the test method in ~~subsection 503.2e~~ Sections 504.2(c) (EPA Method 24), ~~503.2f~~ 504.2(f) (BAAQMD Method 31 [April 15, 1992]) or ~~503.2g~~ 504.2(g) (SCAQMD Method 313-91 [April 1997]) of this rule.

(a) Plastisols, powder coatings, and radiation-cured coatings shall be cured according to the procedures actually used in the coating process being tested before final VOC-emission determinations are made.

(b) In the case of multi-component, polymerizing coatings tested according to ~~503.1a~~ Section 504.1(a) of this rule, Method 24 shall be modified to eliminate the post-mixing dilution-step (that employs toluene or other solvent). Instead, the mixture shall be spread by appropriate technique to form a thin layer, occupying the entire bottom of the foil pan. Techniques included in the method referenced in ~~503.1b~~ Section 504.1(b) of this rule, can be used as a guide for such spreading.

- b. The VOC content of gaseous emissions entering and exiting an ECS shall be determined by either EPA Method 18 referred to in ~~subsection 503.2b~~ Section 504.2(b) of this rule, or EPA Method 25 and its submethod, referred to in ~~subsection 503.2d~~ Section 504.2(d) of this rule.

**AQ-2015-005-Draft Rule 336**

Stakeholder Workshop: Thursday, February 18, 2016  
Contact: Kathleen Sommer – 602-506-6706  
[kathleensommer@mail.maricopa.gov](mailto:kathleensommer@mail.maricopa.gov)

**Maricopa County Air Quality Dept.**

Planning & Analysis Division  
1001 N. Central Ave. Ste. 125  
Phoenix, AZ 85004

- c. Capture efficiency of an ECS shall be determined either by the methods in ~~503.2e~~ Section 504.2(e) of this rule (EPA Method 204 and its submethods), or by using mass balance calculation methods in concert with the methods in ~~503.2a~~ Section 504.2(a) of this rule (EPA Methods 2, 2a, 2c, and 2d).
- d. Measurement of air pressure at the center of the spray gun tip and air horns of an air-atomizing spray gun (~~reference subsection 302.1: Section 225~~) shall be performed using an attachable device in proper working order supplied by the gun's manufacturer for performing such a measurement.
- e. Temperature measurements shall be done with an instrument with an accuracy and precision of less than one-half degree Fahrenheit (0.25°C) for temperatures up to 480°F (250°C).

~~503.2~~ **504.2** **Test Methods Adopted By Reference:** The EPA test methods as they exist in the Code of Federal Regulations (CFR) (July 1, 1998), as listed below, are adopted by reference. The other test methods listed here are also adopted by reference, each having paired with it a specific date that identifies the particular version/revision of the method that is adopted by reference. These adoptions by reference include no future editions or amendments. Copies of test methods referenced in this ~~Section 503~~ Section 504 of this rule, are available at the Maricopa County Air Quality Department, 1001 N. Central Ave., Phoenix, AZ, 85004.

- a. EPA Methods 2 (“Determination of Stack Gas Velocity and Volumetric Flow Rate”), 2a (“Direct Measurement of Gas Volume Through Pipes and Small Ducts”), 2c (“Determination of Stack Gas Velocity and Volumetric Flow rate in Small Stacks or Ducts”), and 2d (“Measurement of Gas volumetric Flow Rates in Small Pipes and Ducts”). All 4 of the foregoing methods are in 40 CFR 60, Appendix A.
- b. EPA Method 18 (“Measurement of Gaseous Organic Compound Emissions by Gas Chromatography”) and its submethods (40 CFR 60, Appendix A).
- c. EPA Test Method 24 (“Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings”) (40 CFR 60, Appendix A).
- d. EPA Method 25 (“Determination of Total Gaseous Non-methane Organic Emissions as Carbon”) and its submethods (40 CFR 60, Appendix A).
- e. EPA Test Methods 204 (“Criteria for and Verification of a Permanent or Temporary Total Enclosure”), 204a, 204b, 204c, 204d, 204e, and 204f (Appendix M, 40 CFR 51).
- f. California’s Bay Area Air Quality Management District (BAAQMD) Method 31 (April 15, 1992), “Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners, and Low Solids Coatings.”
- g. California’s South Coast Air Quality Management District (SCAQMD) Method 313-91 (April 1997).

~~503.3~~ **504.3** **Test Methods for ECS:** For coatings/adhesives controlled pursuant to ~~subsection~~ Section 302.1 or ~~subsection~~ Section 305.3 of this rule:

- a. Measurements of VOC emissions from an ECS shall be conducted in accordance with EPA Methods 18 or its submethods, or by Method 25 or its submethods (40 CFR 60, Appendix A).
- b. Capture efficiency of an ECS shall be determined by mass balance in combination with ventilation/draft rate determinations done in accordance with ~~subsection 503.3(e)~~ Section 504.3(c) of this rule or with US EPA Test Methods 204, 204a, 204b, 204c, 204d, 204e, and 204f (Appendix M, 40 CFR 51).



- c. Ventilation/draft rates shall be determined by EPA Methods 2, 2a, 2c, and 2d (40 CFR 60, Appendix A).

504 ~~FORMULA FOR TOTAL VOC VAPOR PRESSURE: Equivalent to: VOC COMPOSITE PARTIAL PRESSURE. Reference subsection 303.2~~

$$PP_c = \frac{\sum_{i=1}^n (W_i)(VP_i) / MW_i}{\frac{W_w}{18} + \sum_{j=1}^m \frac{W_{ej}}{MW_{ej}} + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

~~$W_i$  = Weight of the “i”th VOC compound in grams~~

~~$W_w$  = Weight of water in grams~~

~~$W_{ej}$  = Weight of the “j”th non-precursor compound in grams~~

~~$MW_i$  = Molecular weight of the “i”th VOC compound in grams per gram mole, e.g., one gram mole of isopropyl alcohol weighs 60 grams~~

~~$MW_{ej}$  = Molecular weight of the “j”th non-precursor compound, e.g., 1 gram mole of acetone weighs 58 grams~~

~~$PP_c$  = VOC composite partial pressure at 20°C in mm mercury (Hg)~~

~~$VP_i$  = Vapor pressure of the “i”th VOC compound at 20°C in mm Hg~~

~~18 = Weight of one gram mole of water~~



**Enhanced Regulatory Outreach Program  
Maricopa County Air Quality Department**

**Stakeholder Workshop: Summary  
AQ-2015-005-Rule 336  
Surface Coating Operations  
February 18, 2016**

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**Attendees:**

*8 Stakeholders attended:* City of Phoenix; Salt River Project (SRP); PING; Arizona Public Service (APS); Mesa Fully Formed; and Geosyntec

*0 Stakeholder attended via phone*

*2 Staff attended:* Hether Krause Planning & Analysis Division; Kathleen Sommer Planning and Analysis

**Comments:**

1. Change Section 501.3(c) Title to "Usage or Purchase Records" to allow the facility to choose which type of records they prefer to keep; usage or purchase. The records of materials "used" at a satellite facility could suffice to document VOC usage when records of all materials "purchased" are found only at a central location.
2. How can coatings purchased with cash be accounted for? Record keeping of "usage" at a facility will solve the problem of documenting "cash" purchases of materials used. Tracking purchase records alone is incomplete. Purchase records may only be available from a central purchasing location.
3. Retain record keeping requirement "Grouping by VOC Content" as is found in Section 501.5 of the current rule. This requirement has been retained.
4. A VOC limit was proposed for Surface Preparations in the workshop rule. Will this be the VOC limit for surface preparations and does it include "wipe cleaning?" Wipe cleaning (an example of surface preparation) is exempt in Maricopa County Rule 331 and should be consistent within all county rules, including Rule 336.

The cleaning chemicals used in surface coating cleaning operations contain little VOC and therefore generate negligible emissions as discussed on page 8 of the CTG for Miscellaneous Metal and Plastic Parts Coatings. As a result Section 304.5 containing a VOC limit for Surface coatings has been deleted and replaced with "A VOC cleaning solvent may be used for the cleaning of coating-application equipment, if such application equipment does not use spray devices and the same principal solvent is used for cleaning as is used in the coating."

5. Does the Small Surface Coating Source (SSCS) need to keep daily records? In Small Surface Coating Source (SSCS) (Section 282 of this rule) the daily record keeping requirement was removed and the 2 tons/yr threshold was retained.
6. Review Rule 331(Solvent Cleaning) for conflicts with proposed Rule 336.Section. The "Wipe" cleaning exemption that is found in rule 331 is also proposed for exemption in Rule 336.
7. Exemption Section 103.5 is not clear as to which sections of Rule 336 are exempt and which are required for this category of operations. This section has been rewritten and clarified.

8. "Touch-up and repair coatings" are both listed as exempt and there is a VOC coating threshold for Touch-up and Repair in the Rule 336 Coating Tables. Which one is correct?

Section 103.3(a): "Touch-up and repair coatings" for Plastic Parts Coating are exempt from the VOC limits in Rule 336. This is confirmed on page 31 of the CTG. The "Touch-up and Repair" coating thresholds found in Table 336-1 are coating limits for Metal Parts and Products. "Metal part touch-up and repair coatings" are exempt from the application methods (Section 302 of this rule) but are subject to the remaining provisions of this rule.

9. It is not clear why repair coating has to be conducted at the facility where the coating was applied. Repair Coating (section 278) was clarified and is not required to be completed where the original painting was done.
10. Do not delete the general coating "Other Metal Parts and Products" in the current rule because up to 40% of the coatings used at some facilities fall within this category.

The definitions and VOC limits for the general coating categories: "One-Component" and "Multi-Component" Coatings " have been deleted because they are redundant with "Other Metal Parts and Products Coating." Retaining the existing coating category "Other Metal Parts and Products" will include the two following general coatings that were included from the listing in the CTG.

"One-Component" is ready to apply straight from the container.  
"Multi-component" is a coating that needs a catalyst or hardener.

11. Clarify Section 103.5(a) concerning Aerosol Spray Cans: Aerosol Spray Can Coating Exemptions apply to use of non-refillable containers, that are less than 22 fluid ounces (0.66 liter) capacity and the VOC usage of this exemption contributes to the t/yr. facility threshold. Emissions at or below 2 t/yr. qualifies as an insignificant activity (Rule 200: Section 200.63) although these emissions are not "trivial activities" as Aerosol Spray Can Coating is "conducted as part of a source's primary business activity" (Rule 200: Section 200.127)
12. Recordkeeping Section 501.1 "A" through "D" is confusing. "Section 501.1 has been clarified to state both volumes of coatings purchased/ used and VOC content of the coatings are required recordkeeping. The requirement for daily recordkeeping has been deleted.
13. Section 402.1: Is this requirement meant to update all O&M Plans within the facility? This should be limited to the O&M plans required by this Rule 336. Section 402.1 is clarified to require revising the O&M plans for ECS equipment subject to this rule.
14. Clarify Exemption Section 103.5(b): 55 gallons of what liquid? Section 103.5(b) has been clarified to explain an annual use of "VOC coatings which exceed thresholds for the coating categories listed in Tables 336-1 through 336-7 of this Rule" shall not be greater than 55 gallons in a year.

**Next Steps:** The department will revise draft Rule 336 and will e-mail the revised draft to workshop attendees for review and comment. The department does not anticipate conducting another workshop.

# **Air Quality Rules**

**Hether Krause**

Planning and Analysis Division Manager  
Maricopa County Air Quality Department

[hetherkrause@mail.maricopa.gov](mailto:hetherkrause@mail.maricopa.gov)

(602) 506-6731

# Ozone Update



- Recent reclassification for the 2008 Ozone Standard – Moderate
- January 1, 2017 deadline to submit a Moderate Plan (Ozone SIP)
- Attainment Deadline for meeting 2008 Standard is July 2018
- Moderate Plan requires VOCs and NO<sub>x</sub> rules review for most recent CTGs and RACT – some of our rules do not meet current CTGs and RACT
- New Ozone Standard October 2015 – 70 ppb



**Maricopa County**

Air Quality Department

# Maricopa County Air Quality Department

## Mission:

To provide clean air to Maricopa County residents and visitors so they can live, work and play in a healthy environment.



**Help reduce ozone pollution.**

Carpool, take light rail or the bus, reduce idling or telecommute.

**CLEAN AIR MAKE MORE**  
CleanAirMakeMore.com



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**Maricopa County**

Air Quality Department

# Proposed Rule Revisions

Rule 140: Excess Emissions (Start-Up/Shutdown/Malfunction; Litigated)

Rule 316: Nonmetallic Mineral Processing (SIP Litigated)

Rule 322: Power Plant Operations

Rule 323: Fuel Burning From ICI Sources

Rule 324: Stationary Internal Combustion (IC) Engines

## **Rule 336: Surface Coating Operations**

Rule 342: Coating Wood Furniture And Fixtures

Rule 345: Vehicle And Mobile Equipment Coating

Rule 350, 351, 352 and 353: Organic Liquids And Gasoline Rules

Rule 356: Polyester Resin Operations

Rule 357: Miscellaneous Industrial Adhesives



**Maricopa County**

Air Quality Department

# Steps For The Proposed Rule Revisions

<b>1-County Manager Briefed Board Of Supervisors</b>	<b>June 2015</b>
<b>2-County Stakeholder Workshops</b>	<b>June 2015 – March 2016</b>
<b>3-Stakeholder Notification 2 Weeks Before Board Of Health Meeting</b>	<b>April 2016</b>
<b>4-Board Of Health Meeting To Initiate Regulatory Change</b>	<b>April 2016</b>
<b>5-Specific Departmental Processes (Includes 30-Day Comment Period)</b>	<b>May 2016 – June 2016</b>
<b>6-Stakeholder Notification 2 Weeks Prior To Board Of Health Meeting</b>	<b>July 2016</b>
<b>7-Board Of Health Meeting To Make Recommendations To Board Of Supervisors</b>	<b>July 2016</b>
<b>8-Schedule Board Of Supervisors' Public Hearing</b>	<b>September 2016</b>
<b>9-Board Of Supervisors' Public Hearing</b>	<b>November 2016</b>
<b>10-Item Adopted</b>	<b>November 2016</b>

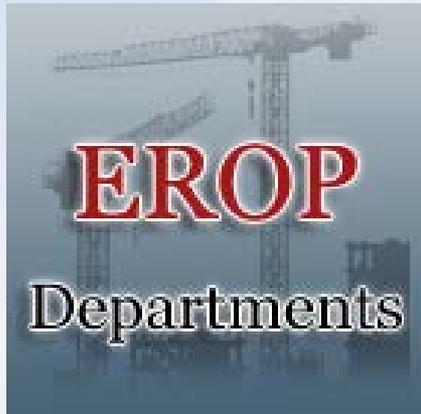


**Maricopa County**

Air Quality Department



## MARICOPA COUNTY ENHANCED REGULATORY OUTREACH PROGRAM



Maricopa County's Enhanced Regulatory Outreach Program (EROP) Departments seek to ensure the safety and well-being of our community. Because we understand that regulations and rule-making decisions, discussions, and meetings can be confusing, we have developed this web-site to allow citizens to easily monitor and engage in the adoption and amendment of all regulations.

**AIR QUALITY • ENVIRONMENTAL SERVICES • FLOOD CONTROL • PLANNING & DEVELOPMENT • PROCUREMENT SERVICES • TRANSPORTATION**

<http://www.maricopa.gov/regulations/>



**Maricopa County**

Air Quality Department





# Building Regulations Relationships

# Maricopa County

Home Air Quality Environmental Services Flood Control Planning and Development Procurement Services Transportation  
Comments Definitions Notifications

Current Location: [Regulatory Departments](#) | [Comments](#)

## Citizen Comments

Your input will be collected and forwarded to the appropriate department. We appreciate your comments and your time. If you prefer, you can send your comments via [email](#).

### Case Information

\*

I would like to: \*

### Your Information

First Name \*  Last Name \*

Organization

City \*  Zip

Email \*

Phone Number  Phone Type:  mobile  work  home

Would you like for someone to contact you?  yes  no

### Comments

If you would like to attach supporting documentation associated with your comment, please click [here](#).

# **Rule 336**

## **Surface Coating Operations**

### **Stakeholder Workshop #4**

#### **February 18, 2016**

Kathleen Sommer  
Senior Planner



# Overview

## The purpose of this rulemaking is:

- To update Rule 336 to address the requirements of the State Implementation Plan (SIP) for “moderate” nonattainment for the 2008 eight-hour ozone national ambient air quality standard (NAAQS)
- To include Reasonably Available Control Technology (RACT) for VOC RACT as defined in the EPA - Control Technique Guidelines (CTG)

## Control Technique Guidelines (CTG)s



# Overview

## Control Technique Guidelines (CTG)s

### Rule 336 (Surface Coating Operations)

Large Appliance Coatings, September, 2007

Metal Furniture Coatings July 2007

Miscellaneous Metal and Plastic Parts Coatings September, 2008

Industrial Cleaning Solvents, September 2006

Paper, Film and Foil Coatings, September 2006

Miscellaneous Metal and Plastic Parts Coatings September, 2008



**Maricopa County**

Air Quality Department

Rev. 3/9/2016

# Agenda

## Overview

### Rule 336 Proposed Revisions

- Stakeholder Comments From Workshop #3 Held on December 17, 2015
- Stakeholder Comments After Workshop #3
- Additional Revisions Since Workshop #3
- Additional Revisions For Consideration

### Workshop #4 Summary



**Maricopa County**

Air Quality Department

# **Rule 336**

## **Stakeholder Comments From Workshop #3 Held On Dec. 17, 2015**



# Stakeholder Comments From Workshop #3

**Comment:** Revert back to the current rule language and do not move from Applicability Section 102.3 to Section 103.1

**Response:** Restored Section 102.3



# Stakeholder Comments From Workshop #3

**Comment:** Define the term “Multi-Colored Coating”

**Response:** Multi-Colored Coating: A coating that is packaged in a single container, applied in a single coat and exhibits more than one color when applied.



# Stakeholder Comments From Workshop #3

**Comment:** Define the term “Multi-Component Coating”

**Response:** Multi-Component Coating: A coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, prior to application to form an acceptable dry film.



# Stakeholder Comments From Workshop #3

**Comment:** Define the term “One-Component Coating”

**Response:** One-Component Coating: A coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component.



# Stakeholder Comments From Workshop #3

**Comment:** Remove all references to VOC Vapor Pressure.

**Response:** The definition of “Total VOC Vapor Pressure (VOC Composite Partial Pressure)” has been deleted from the definitions in Section 200. All references to VOC vapor pressure have been deleted.



# Stakeholder Comments From Workshop #3

**Comment:** Pleasure Craft Surface Coating should be listed under Section 300 Standards and removed from Section 102 Applicability.

**Response:** Pleasure Craft Surface Coating has been removed from Section 102 applicability\*

\*Will be discussed further under “Additional Revisions For Consideration” slide



# Stakeholder Comments From Workshop #3

**Comment:** Remove the requirements for manufacturers and suppliers proposed in this rule

**Response:** Requirements for manufacturers and suppliers have been removed from the rule



# Stakeholder Comments From Workshop #3

**Comment:** Three VOC threshold limits in Table 336-7 for Pleasure Craft Coating VOC Limits: (Extreme High Gloss Topcoat; Finish Primer Surfacer; Other Substrate Anti-foulant Coating), should be raised to be consistent with other jurisdictions.

**Response:** The VOC limits in Table 336-7 are proposed to be:

Extreme High Gloss Topcoat	600 g VOC/l;
Finish Primer Surfacer;	600 g VOC/l;
Other Substrate Anti-foulant Coating	400 g VOC/l.



# Stakeholder Comments From Workshop #3

**Comment:** The rule should contain a transition schedule to allow time to transition and comply with new VOC limits or specified practices

**Response:** Section 400 (Administrative Requirements) has been amended to specify a transition period for use of an Emission Control System (ECS) (one year) , implementation of changes in the VOC limits (6 months after rule adoption), and O & M plan (3 months)



# Stakeholder Comments From Workshop #3

**Comment:** What are the record keeping requirements for an aerosol spray can exemption

**Response:** Section 501.1(d) has been amended: Aerosol Spray Cans: Maintain purchase records for aerosol spray-cans, including VOC content of can contents\*

\*Will be discussed further under “Additional Revisions For Consideration” slide



# Stakeholder Comments From Workshop #3

**Comment:** Clarify conflicting exemptions “Low VOC Usage Surface Coating Facility” and “Small Surface Coating Exemption”

**Response:** Propose to delete Section 103.2: Low VOC Usage Surface Coating Facility, for clarity



# Rule 336

## Stakeholder Comments After Workshop #3



# Stakeholder Comments After Workshop #3

**Comment:** Clarify how to demonstrate a HVLP spray-gun equivalent or the spray-gun transfer efficiency requirement

**Response:** Section 302.1(i) provides methods available to prove spray-gun transfer efficiency\*

\*Will be discussed further under “Additional Revisions For Consideration” slide



# Rule 336

## Additional Revisions Since Workshop #3



# Additional Revisions Since Workshop #3

- Propose to re-title Section 103 to “Partial Exemptions” and to incorporate previous Section 105 into this restructured section
- Propose to reformat Section 103 to list all partial exemptions in Sections 103.1 through 103.6



# Additional Revisions Since Workshop #3

Propose to add the following definitions:

- “Electromagnetic Interference (EMI)/ Radio-Frequency Interference (RFI) Shielding”
- “Flow Coat”
- “Fog Coat”
- “Texture Coating”
- Propose to change the term “Drum Coating” and add “Coating of” at the beginning of the definition
- Propose to combine the definitions of “Pressure Sensitive Label” and “Pressure Sensitive Tape” into one definition: “Pressure Sensitive Tape or Label”



# Additional Revisions Since Workshop #3

- Propose to change “VOC Content: VOC content is the organic chemicals in a material that have a high vapor pressure at ordinary room temperature. The high vapor pressure results from a low boiling point, which causes large numbers of molecules to evaporate or sublime from the liquid or solid form of the compound and enter the surrounding air. The term VOC content is a general term used throughout the rule and includes VOC actual or VOC regulatory”
- Propose to remove: “Exempt Evaporating Components (Exempt Compounds)” as it is defined in Maricopa County Rule 100
- Propose to remove: “Minus Exempt Compounds or Minus Exempt Evaporating Compounds” because it is defined in the definitions of VOC Actual and VOC Regulatory



# Additional Revisions Since Workshop #3

- Propose to remove: “Non-Precursor Organic Compound” because they are defined in Appendix G of these rules
- Propose to remove: “Other Metal Parts and Products” because it is not needed
- Propose to remove: “VOC Borne Coating because it is not needed
- Propose to add “Refrigerated Glass Door Coatings” to Table 336-5



# Additional Revisions Since Workshop #3

- Propose to retain the current VOC limit for Surface Preparation: 1.4 lbs/gal (168 g/l)
- Propose to move “Surface Preparation” to Section 304: Work Practices- Handling, Disposal and Storage of VOC-Containing Material.
- Propose to revise Section 301.2 Emission Control System (ECS ) for clarification
- Propose to consistently list the metric units (g VOC/l) before the English units (lbs/ gal) throughout the rule
- Propose to relocate the Standards Section 302.1(g): Low Usage Allowance for Restricted Guns: to Exemptions Section 103.6



# Additional Revisions Since Workshop #3

- Propose to omit the list of application methods specific only to Pleasure Craft in Section 302
- Propose to relocate “Extreme High Gloss Coatings” application methods to the Exemption Section 103.4(c)
- Propose Section 303.1(b)(1)(g) Spray-Gun Cleaning Machines shall be operated and maintained according to Operation and Maintenance (O&M) Plan and manufacturer’s or distributor’s instructions
- Propose to restructure Section 500: Monitoring and Records



# Rule 336

## Additional Revisions For Consideration



# Additional Revisions For Consideration

- Propose to add to an additional Table to Standards Section 301:

Table 336-8: VOC Limits for Cleaners

	g. VOC /l.	lbs. VOC/ gal.
Surface Preparation (Section 304.5)	168	1.4
Solvent Cleaner (Section 303.2(c))	50	0.42

- Propose to remove Section 303.2(c) due to the addition of Table 336-8



# Additional Revisions For Consideration

- Propose in Section 245 (definition of “High Volume, Low Pressure (HVLP) Spray-Gun”) delete “ and at the air horns”
- Propose in Section 504.1(d) to delete “ and air horns”
- Propose: Section 304.5(a) replace the phrase “according to section 297.2 of this rule” with the phrase “according to VOC Actual as defined in this rule”



# Additional Revisions For Consideration

- Propose Pleasure Craft Surface Coating in Standards Section 301.4:  
Pleasure Craft Surface Coating: The application of surface coatings on fiberglass and metal recreational boats (pleasure craft: Section 267) or their parts and components, for the purpose of refinishing, repairing, modifying or manufacturing such craft.
- Propose to clarify Section 501.1(d) by removal of the following text “of can contents”
- Propose to clarify Section 103.5(d) that an owner or operator may qualify for a SSCS exemption if s/he agrees in writing to enforceable permit conditions.



# Additional Revisions For Consideration

- Propose two alternatives to demonstrate HVLP spray-gun equivalency in Section 302.1(i): Any method which achieves a transfer efficiency of greater than or equal to 65% as demonstrated by the following:
  - (1) Measurement according to Section 504.1(d) of this rule; or
  - (2) From testing documentation of the spray-gun status provided by the manufacturer.



**Thank you.**

