

Air Quality Rule 342: Coating Wood Furniture and Fixtures

Cheri Dale

Planning and Analysis Division Rule Writer
Maricopa County Air Quality Department

CheriDale@mail.maricopa.gov

(602)506-3476



Maricopa County
Air Quality Department

Workshop 1 Outline

- Brief history of Wood Coating Rules
- Proposed Revisions
- Anticipated Timeline
- Questions



History

- Federal Level:
 - Control Techniques Guidelines (CTGs)
 - National Emission Standards For Hazardous Air Pollutants (NESHAP)
- County Level
 - 1996
 - 2013



Maricopa County

Air Quality Department

Why is Rule Revision Necessary?

- Current Classification for the 2008 Ozone Standard – Marginal
- “Bumped-up” to Moderate Classification
- Moderate Plan requires VOCs rules review of CTGs and RACT
- Changes in Technology



References: Federal Documents

- Control Techniques Guidelines Document: Wood Furniture Manufacturing Operations.
- A Guide To The Wood Furniture CTG and NESHAP EPA 453/R-97-002, September 1997.
- Wood Furniture Manufacturing Operations NESHAP Implementation Document EPA-456/R-97-005, September 1997, Updated March 2004.
- Case Studies: Low-VOC/HAP Wood Furniture Coatings, EPA-600/R-00-043, May 2000.
- UV-Curable Wood Furniture Coatings Case Studies.
- Waterborne Wood Furniture Coatings Case Studies.



Maricopa County

Air Quality Department

References: Industry

- Competitive Implications of Environmental Regulation in The Paint And Coatings Industry. Case study. Copyright 1994 by MEB.
- Wood Coatings For The Furniture Industry, Painting and Coating Industry Article, April 11, 2000. Originally presented at RadTech 1999 in Berlin, Germany.
- Formulating Acid Catalyzed Wood Coatings: What You Need to Succeed. Eastman Chemical Company Publication GN-473, March 2005.
- Spray Gun manufacturer technical sheets.
- Coating manufacturer technical sheets.



Maricopa County

Air Quality Department

References: Other Agencies

- Technology Assessment for Rule 1136 – Wood Products Coatings, South Coast Air Quality Management District (CA), June 2003.
- Rule 67.11 Wood Products Coating Operations, San Diego County (CA) Air Pollution Control District, Adopted 3/14/89; Revised 6/27/12 & Effective 6/27/13).
- Regulation 8: Organic Compounds, Rule 32: Wood Products Coatings, Bay Area (CA) Air Quality Management District, August 5, 2009.
- Rule 3.20 Wood Products Coating Operations, Feather River (CA) AQMD, Adopted 12/05/2005, Amended 08/01/2011.
- Rule R307-343. Emissions Standards for Wood Furniture Manufacturing Operations Utah Administrative Code, December 1, 2014.
- Rule 3745-21-15 Control of VOCs from Wood Furniture Manufacturing Operations, Ohio, July 13, 2015.



Maricopa County

Air Quality Department

PROPOSED Revisions

- To clarify applicability by inserting a table of SIC codes and title.
- To move exemptions to front of rule in Section 100.
- To make definitions consistent with federal definitions.
- To reduce the VOC content for coating materials.
- To include standard work practices.
- To include operator training requirements.
- To delete appendices and include in body of rule.



My Questions!

- What is the difference between “PAINT” and “COATING”?
- What are the units of measure used for calculating emissions?
- Do the categories of coatings in rule reflect current industry terminology?
- Are there new coating technologies that need to be included in rule?
 - Application methods?
 - Equipment?
 - Products?
- Are “RED” and “GREEN” tags still needed?

The PROPOSED [Rule](#)



Maricopa County

Air Quality Department

Steps For The Proposed Rule Revisions

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





Building
Relationships

Maricopa County

MARICOPA COUNTY ENHANCED REGULATORY OUTREACH PROGRAM



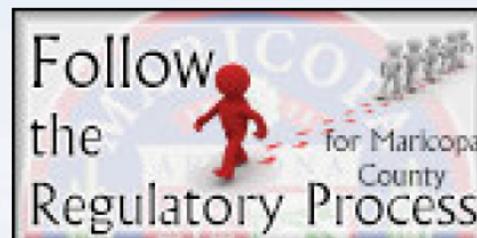
Maricopa County's Enhanced Regulatory Outreach Program (EROP) Departments seek to ensure the safety and well-being of our community. Because we understand that regulations and rule-making decisions, discussions, and meetings can be confusing, we have developed this web-site to allow citizens to easily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



Workshop 1 Review

- ✓ Brief history of Wood Coating Rules
- ✓ Proposed Revisions
- ✓ Anticipated Timeline
- ✓ Questions ?

