



Enhanced Regulatory Outreach Program Maricopa County Air Quality Department

Notice of Stakeholder Workshops

Date: Monday, August 3, 2015

Location: 1001 North Central Avenue, Floor 5 Classroom*

The Maricopa County Air Quality Department (department) will conduct the first of a series of Stakeholder Workshops to discuss proposed rule revisions. The schedule and a description of each rule to be discussed are provided below. Also, the draft rules associated with these workshops are attached to this announcement.

9:30 am – 10:30 am AQ-2015-004-Rule 324 (Stationary Internal Combustion (IC) Engines)

Rule 324 limits the discharge of carbon monoxide, nitrogen oxides (NO_x) sulfur oxides, volatile organic compounds (VOCs) and particulate matter emissions from stationary internal combustion (IC) engines with a rating of greater than 250 brake horsepower. The department is proposing to revise emissions limits and administrative requirements. The department is proposing to revise Rule 324 to address the requirements of the State Implementation Plan (SIP), pending the U.S. Environmental Protection Agency's (EPA's) reclassification of Maricopa County from "marginal" to "moderate" nonattainment for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS).

11:00 am – 12:00 pm AQ-2015-006-Rule 342 (Coating Wood Furniture And Fixtures)

Rule 342 limits the emissions of VOCs from the surface preparation and coating of wood furniture and fixtures. The department is proposing to revise the emissions limits and work practice requirements. The department is proposing to revise Rule 324 to address the requirements of the State Implementation Plan (SIP), pending the U.S. Environmental Protection Agency's (EPA's) reclassification of Maricopa County from "marginal" to "moderate" nonattainment for the 2008 eight-hour ozone National Ambient Air Quality Standard (NAAQS).

1:30 pm – 2:30 pm AQ-2015-007-Rule 140 (Excess Emissions)

Rule 140 establishes an affirmative defense and associated administrative requirements for certain emissions in excess of an emission standard or limitation. The department is proposing revisions to Rule 140 to address the EPA's response to a petition for rulemaking filed by the Sierra Club concerning treatment of excess emissions by sources during periods of startup, shutdown, or malfunction.

Additional information about these draft rules is available on the Enhanced Regulatory Outreach Program (EROP) website (<http://www.maricopa.gov/regulations>).

To enhance the discussion and cost savings, as well as support the county's sustainability initiative, information will be electronically displayed during the workshops. If you prefer a hardcopy of the documentation, please print the information from this announcement.

Thank you for participating in the rulemaking process.

*When you arrive at 1001 North Central Avenue, please check-in in Suite #125 then proceed to the Floor 5 classroom.



REGULATION III – CONTROL OF AIR CONTAMINANTS

**RULE 342
 COATING WOOD FURNITURE AND FIXTURES**

INDEX [NOT INCLUDED IN THIS DRAFT]

Adopted 04/03/96
Revised 11/20/96
Revised 09/25/13

Adopted 04/03/1996; Revised 11/20/1996; Revised 09/25/2013; and Revised MM/DD/YYYY

**MARICOPA COUNTY
 AIR POLLUTION CONTROL REGULATIONS**

REGULATION III – CONTROL OF AIR CONTAMINANTS

**RULE 342
 COATING WOOD FURNITURE AND FIXTURES**

SECTION 100 – GENERAL

101 PURPOSE: ~~To limit emissions of volatile organic compounds from the surface preparation and coating of wood furniture and fixtures (VOCs) from wood products coating operations, and from the organic solvent cleaning, and the storage and disposal of solvents and waste solvent materials associated with such coating operations.~~

102 APPLICABILITY: ~~The provisions of this rule apply. This rule is applicable to any person in facility in Maricopa County applying that applies finishing material to furniture or fixtures made constructed of wood or wood derived material. Simplified provisions of Appendix B in this rule may be used by facilities which agree to a permit limit of less than 10 tons of VOC emissions per year. For sources emitting less than 2 tons of VOC per year, consult subsection 307.2d. This rule does not apply to the coating of any millwork included under SIC #2431.~~

103 EXEMPTIONS:

103.1 Total Exemption:

- a.** This rule does not apply to the coating of any millwork included under SIC #2431.
- b.** The following materials are exempt from this rule: adhesives, architectural coatings, printing ink, and coatings not applied on or over a wood product substrate.

103.2 Partial Exemptions: The following are exempt from Section [VOC limits] of this rule, but shall comply with all other provisions in this rule:

- a. Touch-up Cans:** Coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs.
- b.** The use of the following coating types when the annual total use of all such types together is less than 55 gallons (XX liters): prepackaged aerosol spray cans which are not used for touch-up or repair, metal leaf finishes, and faux finishes.
- c. Refinishing, Replacement, and Custom Replica Furniture Operations:** Any refinishing operation necessary for preservation, to return the furniture or fixture to



original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.

- d.** The coating for polyester resin application finish which does not exceed a VOC limit of 1 lb VOC/gallon (120 g/l).
- e. Small Source Status:** A furniture coating facility which at any time demonstrates that it currently meets all the requirements in subsections 103.2.d. (1) and (2) of this rule, is exempt from all provisions of this rule except for Section XXX “Operation & Maintenance”, Section YYY "Handling and Disposal of VOC" and Section ZZZ “Recordkeeping Requirements”.
 - (1)** Facility records demonstrate that no more than a total of 20 gallons (XX liters) of VOC-borne wood-product coatings plus VOC-solvent are used in any consecutive 12-month period.
 - (2)** The facility emits less than 150 pounds VOC, facility-wide, per consecutive 12-month period, from all wood-product coating operations, excluding aerosol can usage, surface preparation, cleanup and stripping material.
- f. Non-Compliant Coating Application:** A person may use a conventional air-atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb if all the following conditions are met:
 - (1)** The volume of such coating applied is less than 5% of the total volume of coating applied at the facility;
 - (2)** Each gun has a red tag when spraying materials exceeding 1 lb VOC/lb, as specified in Section 4XX (Administrative Requirements) of this rule; and
 - (3)** A log shall be kept as specified in Section 5XX (Recordkeeping Requirements) of this rule.

Errata Note¹

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:** Any chemical substance, usually having a fluid phase during application, used principally to bond two or more surfaces into close proximity with one another. that is applied for the purpose of bonding two surfaced together other than by mechanical means. Adhesives are not considered coatings for finishing materials in this rule.
- 202** **AEROSOL SPRAY COATING:** A coating which is sold in a hand-held, pressurized, non-refillable container, usually 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** **AIR-ATOMIZED SPRAY (GUN):** Equipment used to apply coatings in which the chief means of atomizing the coating is via pressurized air which also mixes into the cloud of coating particles after expulsion from a spray nozzle.

¹⁻¹ This errata note is not part of Rule 342. For the reader’s convenience, the second subsection 307.2e. was an earlier draft of the section not intended to be left in the rule. It will be removed for the next revision of this rule.



XXX AS APPLIED: *(is this definition needed?)*

- 204 ARCHITECTURAL COATING:** Any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements or to curbs.
- 205 BASECOAT:** A coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other high-hiding finishing materials. A basecoated surface usually receives a topcoat also.
- 206 CERTIFIED PRODUCT DATA SHEET:** A document, signed by an officer of a coating-supplying operation, stating precisely the maximum VOC content of a particular coating as supplied.
- 207 COATING:** Any liquid, fluid, or mastic composition which is converted to a solid (or semi-solid) protective, decorative, or adherent film or deposit after application to a substrate as a thin layer..
- 208 CONVENTIONAL AIR-ATOMIZED SPRAY:** Any spray coating method in which the coating is atomized principally by mixing it with compressed air at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization, and which is not used with an electrostatic transfer system. Airless and air-assisted airless spray technologies are not conventional air-atomized spray because the principal means of atomizing the coating is via hydraulic pressure and not by mixing the coating with compressed air.
- 209 CUSTOM REPLICA FURNITURE:** Furniture individually produced or repaired after an order has been received from a client specifying a particular style and period, using both the style and the methods of construction, including materials, joinery, and finishes, which are authentic to the period.
- 210 DAY:** A period of 24 consecutive hours beginning at midnight.
- 211 DILUENT:** For the purpose of this rule, any fluid in or added to a coating such as thinner, retarder, reducer, solvent, or drying accelerator which solubilizes, adjusts concentration, viscosity, flow, or drying rates and which evaporates as the coating film solidifies and cures.
- 212 ELECTROSTATIC APPLICATION:** A method of applying coating by electrically charging coating droplets or particles causing their deposition onto a substrate by electrostatic attraction.
- 213 EMISSION CONTROL SYSTEM (ECS):** A system for reducing emissions of organic compounds, consisting of both collection and control devices which are approved in writing by the Control Officer and are designed and operated in accordance with good engineering practice.
- 214 FACILITY:** For the purpose of this rule, all the pollutant-emitting activities located on one or more contiguous or adjacent properties, under the control of the same person or persons under common control, and described by one or more of the industrial groupings listed in Section 238 of this rule.
- 215 FAUX FINISH:** A finish intended to simulate a surface other than wood, including, but not limited to, stone, sand, metal, fur and leather.
- 216 FINISHING MATERIAL:** A coating other than one designed solely or principally as an adhesive, temporary maskant, and/or preservative. For wood furniture and fixtures, finishing materials include, but are not limited to, topcoats, sealers, primers, stains, basecoats, washcoats, enamels, toners, glazes, and graining inks.



- 217 HIGH SOLIDS STAINS:** Stains which are formulated to enhance wood grain and change wood color, but not conceal surface grain. For the purpose of this rule, high solids stains are stains that contain at least 120 grams of solids per liter (1 lb/gal) of stain as applied, and can include wiping stains and glazes.
- 218 KILOGRAMS VOC PER KILOGRAM OF COATING SOLIDS:** A measurement that is used in this rule to express the VOC content of a coating. For any coating, kilograms VOC per kilogram coating solids is numerically identical to both pounds of VOC per pound of coating solids and to grams VOC per gram of coating solids. Abbreviations used include kg VOC/kg solids (lb VOC/lb solids) or simply kg/kg (lb/lb).
- 219 LOW PRESSURE SPRAY GUN:** An air-atomized spray gun which by design functions best at tip pressures below 10 psig (0.7 bar) measured according to subsection 502.2 of this rule, and for which the manufacturer makes no public claims that the gun can be used effectively above 12 psig (0.8 bar).
- 220 LOW SOLIDS STAINS:** Stains which are formulated to enhance wood grain and change wood color, but not conceal surface grain. For the purpose of this rule, low solids stains are stains that contain up to 120 grams of solids per liter (1 lb/gal) of stain as applied, and include sap stain, toner, and non-grain-raising (NGR) stains.
- 221 NONPERMANENT FINAL FINISH:** A material such as wax, polish, non-oxidizing oil or similar substance which retains its effect only temporarily and must be periodically reapplied to a surface to maintain or restore the material's intended effect.
- 222 POUNDS VOC PER POUND OF COATING SOLIDS:** A measurement of a coating's VOC content identical with kilograms VOC per kilogram of coating solids.
- 223 REPAIR COATING:** A coating used to recoat portions of a previously coated product to cover mechanical damage to that previous coating following normal painting operations.
- 224 RESTRICTED-USE GUN:** Any spray gun which atomizes coating using compressed air, such that in normal use or a use advertised by the manufacturer or distributor, the tip pressure exceeds 12 psig (0.8 bar) in measurements done pursuant to subsection 502.2. Restricted-use gun also includes, but is not limited to, all conventional air-atomized spray guns.
- 225 SEALER OR PRIMER:** A film-building finishing material used to seal the pores of wood or wood-derived material before additional coats of finishing material are applied. Finishing materials used primarily to alter the appearance or color of the substrate, such as stains, washcoats, glazes, inks, and toners, are not sealers.
- 226 SINGLE RESIN-LAYER FINISH:** A completed, consumer ready finish, which has received only one application of resin-based coating serving as both sealer and topcoat, and having a total average dry finish thickness from the top of the finish to the surface of the wood-product substrate not exceeding 3 mils (0.076 mm) before sanding, as determined pursuant to the test method in subsection 502.3. If a washcoat is also used, the finish is not a single resin-layer finish.
- 227 STAIN:** A coating, excluding sealers and topcoats, that is formulated to enhance wood grain and change wood color, but not conceal surface grain. Stain includes all high solids stains and all low solids stains.
- 228 STRIPPABLE COATING:** A coating which is applied to spray booth surfaces to receive the overspray and protect the substrate, and which is designed to be readily pulled off in strips or sheets and disposed of.



- 229 **STRIPPING OPERATION:** Any operation in which organic solvent is used to remove coating from a substrate.
- 230 **TOPCOAT:** The last permanent, functional film-building finishing material applied to a manufactured wood product. When the wood-product substrate is already sealed with sealer, any further coats that build a functional film are topcoats. Finishing materials used primarily to alter the appearance or color of the substrate, such as stains, washcoats, glazes, inks, and toners are not topcoats. A nonpermanent final finish is not a topcoat.
- 231 **TOUCH UP COATING:** A coating used to cover minor coating imperfections after the main coating operation.
- 232 **TRANSFER EFFICIENCY:** The ratio of the weight of coating solids deposited on an object to the total weight of coating solids used in a coating application step or series of such steps, expressed as a percentage.
- 233 **VOC-BORNE COATING:** A coating in which the volatile portion contains, by weight, more VOC than water.
- 234 **VOC-SOLVENT:** A solvent or diluent, used to solvate, dilute, reduce, thin, clean or strip, in which the weight-percent of VOC exceeds the weight percent of water.
- 235 **WASHCOAT:** A transparent special purpose coating having a solids content by mass of 12.0 percent or less, and which is used to seal wood-product surfaces for any of the following purposes: to prevent undesired staining, to control penetration of subsequent finishes, to provide a barrier when paper laminates are applied to the wood-product, to seal glazes, and to improve adhesion of a waterborne topcoat.
- 236 **WOOD FURNITURE AND FIXTURES:** All furnishings made of wood-product that are included in Standard Industrial Classification (SIC) numbers 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, or 2599 as well as wood-product on convertible furniture under SIC number 2515.
- 237 **WOOD-PRODUCT:** Wood or wood-derived material, such as chipboard, particle board, fiberboard, pressed board, paper, and any other material derived from wood, bamboo, cane, or rattan, that retains some of the physical structure(s) of such original material(s), even if only at a microscopic level.
- 238 **WORKING DAY:** A day, or any part of a day, in which a facility is engaged in manufacturing.

SECTION 300 – STANDARDS

301 LIMITATIONS – VOC CONTENT:

301.1 No person shall apply a topcoat or sealer to wood furniture or fixtures unless VOC content is limited either to the pounds of VOC per pound of solids (kg VOC/kg solids) in Column A or to the grams of VOC per liter in column B:

- a. **General VOC Limits of Coatings as Applied Less Non-Precursor Compounds and Water**

Table 1

	Column A	Column B
	Lb VOC/lb solids	Grams VOC/liter **
Topcoat	1.8	635



Sealer	1.9	645
Acid-cured, alkyd amino topcoat	2.0	655
Acid-cured, alkyd amino vinyl sealer	2.3	680
**less non-precursor compounds & water		

<u>Coating Category</u>	<u>VOC Limit lb VOC/gal</u>	<u>VOC Limit g VOC/l</u>	<u>VOC Limit g VOC/g solids</u>
<u>Clear Sealer</u>	<u>2.3</u>	<u>275</u>	<u>0.36</u>
<u>Clear Topcoat</u>	<u>2.3</u>	<u>275</u>	<u>0.35</u>
<u>Pigmented Sealer</u>	<u>2.3</u>	<u>275</u>	<u>0.21</u>
<u>Pigmented Topcoat</u>	<u>2.3</u>	<u>275</u>	<u>0.25</u>
<u>High Solids Stain</u>	<u>2.9</u>	<u>350</u>	<u>0.42</u>
<u>Low Solids Stain</u>	<u>1.0</u>	<u>120</u>	-
<u>Filler</u>	<u>2.3</u>	<u>275</u>	<u>0.18</u>
<u>Low Solids Toner and Washcoat</u>	<u>1.0</u>	<u>120</u>	-
<u>Strippable Booth Coating</u>	<u>3.0</u>	<u>360</u>	<u>0.8 kg VOC/kg solids</u>
<u>Acid Cured alkyd amino vinyl sealer when used with acid cured alkyd amino conversion varnish topcoat</u>			<u>Sealer – 2.3 kg VOC/kg Solids</u> <u>Topcoat – 2.0 kg VOC/kg Solids</u>
<u>Non-Acid Cured alkyd amino vinyl sealer when used with acid cured alkyd amino conversion varnish topcoat</u>			<u>Sealer – 1.9 kg VOC/kg Solids</u> <u>Topcoat – 2.0 kg VOC/kg Solids</u>
<u>Acid Cured alkyd amino vinyl sealer when used with non-acid cured alkyd amino conversion varnish topcoat</u>			<u>Sealer – 12.3 kg VOC/kg Solids</u> <u>Topcoat – 1.8 kg VOC/kg Solids</u>

b. Option: Lower VOC topcoat and Unlimited Sealer: There is no VOC limit on sealer when the sealer's topcoat does not exceed 0.8 lb VOC/lb (0.8 kg/kg).

c. Coatings with no VOC limits: Stains, washcoats, glazes, toners, inks, and other coatings not specified in this subsection Section 301.1 nor in subsection 301.2 have no VOC limits.

301.2 Strippable Booth Coatings: No person shall use a strippable booth coating unless, as applied, the coating has either no more than 0.8 lb VOC/lb solids or no more than 3.0 lb/gal (360 g/l) less non-precursor volatile compounds.

301.3 Emission Control System (ECS) as an Alternative Control: A facility may meet the VOC limits of either or both subsections Sections 301.1 and 301.2 if the owner or operator complies with all provisions in this rule's Appendix C and with the other applicable provisions of this rule.

301.4 Averaging: An owner or operator of a larger furniture coating facility meeting the applicability requirements of subsection b., in this rule's Appendix A, may comply with subsection 301.1a. of this rule by complying with Averaging-Formula 1 or Averaging-Formula 2 in Appendix A and by complying with all other applicable provisions of Appendix A.



301.5 Smaller Source Option: The owner or operator of a facility that has emitted 2 or more tons but less than 10 tons per year of VOC from all wood coating and associated operations is exempted from all provisions under Sections 300, 400, and 501 (but not Sections 100, 200, and 502) if all provisions are complied with in this rule's Appendix B. Sources emitting less than 2 tons of VOC per year may be allowed exemptions pursuant to subsection 307.2d.

302 LIMITATION OF CONVENTIONAL AIR-ATOMIZED SPRAY AND OTHER SPRAY METHODS ATOMIZING WITH HIGH-PRESSURE AIR:

302.1 Evidence of Transfer-Efficient Spray Equipment: No person shall spray wood furniture with coating exceeding 1 lb VOC/lb solids (1 kg VOC/kg solids) without providing evidence of possession and use of a low pressure spray gun or system, an electrostatic system, or a system in which the energy for atomization is provided principally via hydraulic pressure; this includes air assisted airless and ultra-low-volume-air assisted technologies. Such requirement does not apply to any facility, activity or person specifically exempted by applicable subsections of Section 307 of this rule, or to any specific system which is approved by the Administrator as having a transfer efficiency consistently exceeding 64%.

302.2 Limitation of Air-Atomized Spray other than Low Pressure: No person shall use a conventional air-atomized spray gun or other *restricted use gun*, except:

- a. To apply finishing materials that have a VOC content not exceeding 1.0 lb VOC/lb solids (1.0 kg/kg).
- b. If VOC emissions from the finishing application station, employing such a gun, are captured and directed to an ECS, pursuant to the provisions of Appendix C.
- c. For touch-up and repair under either of the following conditions:
 - (1) such application is performed after completion of the entire finishing operation;
or
 - (2) such application is performed after applying stain, and before any further coating, by equipment having a total capacity not exceeding 2.1 gallons (8 liters).
- d. To apply less than 5% of all coating pursuant to subsection 307.2.e.

302.3 Non-Compliant Coating Application: Using Conventional and other Restricted Use Guns; Red Tag: In addition to the uses of restricted-use guns allowed under Section (*spray gun usage*) of this rule, a person may use a conventional air-atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb if all the following conditions are met:

- (1) The volume of such coating applied is less than 5% of the total volume of coating applied at the facility;
- (2) Each gun has a red tag when spraying materials exceeding 1 lb VOC/lb. Requirements for gun tagging are in Section 403;
- (3) A log shall be kept pursuant to subsection 501.2c. of the amount of coating used by each such gun. This shall be done daily or each time coating is added to the gun's coating reservoir; and semi-annual calculation shall be made, pursuant to subsection 501.2.



- 303 OPERATION AND MAINTENANCE:** Any person subject to this rule shall operate and maintain in proper working order all process equipment in which VOC-containing materials are used or stored.
- 304 CLEANUP AND CLEANING SUPPLY AND APPLICATION EQUIPMENT:**
- 304.1 Booth Cleaning:** No person shall clean spray booth components using a solvent containing more than 8.0 percent by weight of VOC, including water and non-precursor compounds, except for: conveyors; continuous coaters and their enclosures; and metal filters. If the spray booth coating is being replaced, a person shall use no more than 1.0 gallon (3.8 liters) VOC-solvent to clean the booth.
- 304.2 Cleaning Guns and Lines:** A person shall collect all solvent used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.
- 305 HANDLING AND DISPOSAL OF VOC:**
- 305.1 Use and Storage:** A person shall cover and keep covered each VOC-containing material intended for the day's production, which is not currently in use. A person shall store finishing and cleaning materials in closed containers.
- 305.2 Disposal of VOC and VOC-Containing Material:** A person shall store all VOC-containing materials, including, but not limited to, rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.
- 306 DESIGNATION OF VOC-CONTENT REQUIREMENT:** Effective May 3, 1996, a manufacturer of wood-furniture coatings which are subject to this rule shall provide on each coating container or as an accompanying specification of each coating container a designation of VOC content. For topcoats and sealers, this shall be in pounds of VOC per pound of coating solids (g/g) or in pounds VOC per gallon (g/l) less water and non-precursor volatile compounds. This requirement shall not apply to containers having a capacity of one liter (1.05 quart) or less.
- ~~**307 EXEMPTIONS:**~~
- ~~**307.1 Total Exemption:** The following materials are exempt from this rule: adhesives, architectural coatings, printing ink, and coatings not applied on or over a wood product substrate.~~
- ~~**307.2 Partial Exemptions:**~~
- ~~**a. Touch-up Cans:** Coatings in aerosol spray cans not exceeding 22 fl. oz. (0.66 liter) capacity used exclusively for touch-up and/or repairs are subject only to the recording requirements of this rule.~~
- ~~**b. The following shall be exempt from subsection 301.1 and Section 302:**~~
- ~~(1) The use of the following coating types when the annual total use of all such types together is less than 250 gallons (948 liters): prepackaged aerosol spray cans which are not used for touch-up or repair, metal leaf finishes, and faux finishes.~~



- ~~(2) **Refinishing, Replacement, and Custom Replica Furniture Operations:** Any refinishing operation necessary for preservation, to return the furniture or fixture to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture.~~
- ~~e. The coating for a single resin layer finish which does not exceed a VOC limit of 3 lb VOC/lb solids for completed finishes up to 3 dry mils thickness or does not exceed 2.3 lb/lb for finishes over 3 dry mils is exempt from the VOC limits of subsection 301.1 if all of the following conditions are met:~~
- ~~(1) The containers are clearly marked "FOR USE IN SINGLE RESIN LAYER FINISH";~~
- ~~(2) Facility records clearly identify this material: "DOES NOT MEET THE VOC LIMITS OF SECTION 301, RULE 342. FOR USE ONLY IN SINGLE RESIN LAYER FINISHES"; and~~
- ~~(3) The booth used to apply a single resin layer finish above 2.3 lb VOC/lb solids is dedicated to that operation only, and is clearly labeled "FOR SINGLE RESIN-LAYER FINISHES ONLY".~~
- ~~d. **Small Source Status:** A furniture coating facility which at any time demonstrates that it currently meets all the requirements in subsections 307.2d. (1) and (2) following, is exempt from all provisions of this rule except for Section 303 "Operation & Maintenance" and Section 305 "Handling and Disposal of VOC". An operator of such an exempted facility shall keep on the premises current records of all coating related materials currently used, and their VOC content. For this purpose, a complete, updated set of receipts/invoices and Material Safety Data Sheets (MSDSs) will suffice if each receipt/invoice is retained on the premises at least two years.~~
- ~~(1) Facility records demonstrate that no more than a total of 55 gallons (209 liters) of VOC borne wood product coatings plus VOC solvent are used in any month and that such monthly total divided by that month's number of days of coating application does not exceed 3.0 gallons (11.4 liters); and~~
- ~~(2) The facility emits less than 1814 kg (4000 lb) VOC, facility wide per year from all wood product coating operations including VOC in both solvent borne and water borne coatings, all VOC diluent added to coatings, all solvent cleaning and stripping, and VOC solvent used for coating equipment cleanup.~~
- ~~e. **Using Conventional and other Restricted Use Guns; Red Tag:** In addition to the uses of restricted use guns allowed under subsections 302.2 a., b., and c., a person may use a conventional air atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb if all the following conditions are met:~~
- ~~(1) The volume of such coating applied in this way is less than 5% of the total volume of coating applied at the facility;~~
- ~~(2) Each gun has a red tag when spraying materials exceeding 1 lb VOC/lb. Requirements for gun tagging are in Section 403;~~
- ~~(3) A log shall be kept pursuant to subsection 501.2c. of the amount of coating used by each such gun. This shall be done daily or each time coating is added to the~~



~~gun's coating reservoir; and semi-annual calculation shall be made, pursuant to subsection 501.2.~~

Errata Note¹

- ~~e. **Using a Conventional or other Restricted Use Gun Identified by a Red Tag:** In addition to uses allowed under subsections 302.2 a., b., and c., a person may use a conventional air atomized or other restricted use gun to apply coatings exceeding 1 lb VOC/lb on the following limited basis:~~
- ~~(1) The volume of such coating applied in this way is less than 5% of the total volume of coating applied at the facility.~~
 - ~~(2) Each gun always has a red tag when applying coatings exceeding 1 lb/lb. Tag requirements are in Section 403.~~
 - ~~(3) A log shall be kept pursuant to subsection 501.2c, of the amount of coating used by each such gun. This shall be done daily or each time coating is added to the gun's coating reservoir; and semi-annual calculation shall be made, pursuant to subsection 501.2c.~~

SECTION 400 – ADMINISTRATIVE REQUIREMENTS

401 COMPLIANCE SCHEDULE: The following schedule applies, with exceptions for an Emission Control System provided in Appendix C.

401.1 Sources Emitting 50 TPY: Each facility which has applied for or received a Title V permit, or a permit with an annual VOC limit of 50 tons or more, or which has had an aggregate VOC emission to atmosphere after December 31, 1989, of 50.0 tons (45.35 Mg) or more in any calendar year or 300 pounds (136 kg) or more in any day, emitted in compliance with all requirements of this rule and have submitted a Control Plan. The Control Plan shall set forth the maximum VOC content of each coating-as-applied and provide documentation showing how these values were determined.

401.2 Other Sources: The schedule follows for any wood furniture and/or fixture facility with total VOC emissions to atmosphere in each of the years 1990 through 1995 of no more than 300 pounds (136 kg) in any day and 50.0 tons (45.35 Mg) in any calendar year, emitted from wood coating operations and associated cleaning processes:

- a.** A facility shall be in compliance with all applicable provisions of this rule, except for Section 301 and Section 302 by May 3, 1996. Such facility shall be in compliance with Section 301 and Section 302 of this rule by November 15, 1996.
- b. Control Plan:** A facility which has emitted more than 25 tons of VOC from coating operations in any of the years 1993 through 1995 must submit a Control Plan by August 1, 1996, setting forth the maximum VOC content and copies of the documentation showing how the coating-as-applied values were determined.

401.3 Operator Training Requirements?

402 REGULATORY CLARIFICATION

¹ This errata note is not part of Rule 342. For the reader's convenience, the second subsection 307.2e. was an earlier draft of the section not intended to be left in the rule. It will be removed for the next revision of this rule.



- 402.1 Status with Respect to Rules 330 and 336:** ~~No~~^A wood furniture or fixture coating operation subject to this Rule 342 is not is subject to Rule 330 or to Rule 336.
- 402.2 Component Materials that were Subject to Prior Regulation:** The regulatory status of facilities, owners or operators is not affected by the fact that component materials, such as wood composites or paneling, may have been subject to Reasonably Available Control Technology (RACT) or other regulatory requirements in their original manufacture, before their subsequent use by a facility in Maricopa County.
- 402.3 Other Rules:** Nothing in this rule exempts a person from complying with the NESHAP (National Emission Standards for Hazardous Air Pollutants) for coating wood furniture and fixtures or from complying with any other applicable Federal, states, and local laws or regulations.
- 402.4 Coating over Wood Coating(s) the same as Coating onto Wood:** The VOC-limits for finishing materials ~~given in subsection~~ listed in Section 301.1 of this rule apply to such coatings whether applied directly onto any area of wood-product substrate or on any intermediate layer(s) of coating on the wood-product substrate.
- 403 GUN TAGGING REQUIREMENTS:** An owner or operator shall use a red 4 square-inch vivid, durable tag, sticker, or painted emblem/label visible on the gun or within 3 ft of the gun on the gun's hose to meet the tagging/labeling requirements of ~~subsection~~ Section 307.2e of this rule.

SECTION 500 – MONITORING AND RECORDS

- 501 RECORDKEEPING AND REPORTING:** An owner or operator shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. Each record shall be maintained a minimum of five years.
- 501.1 Current List:**
- a. VOC-Containing Materials:** A current list of all VOC-containing material shall be maintained which contains their name or code and their VOC content. Any qualified single resin-layer finish shall be identified as such.
 - b. How to Express VOC Content:**
 - (1) Non-Coatings:** Use grams VOC/liter or lb VOC/gal. for reducers, thinners, cleaners, etc.
 - (2) Stains:** Use grams VOC/liter or lb VOC/gal.
 - (3) Topcoats and Sealers:** Use either lbs VOC/lb solids or g VOC/liter (lb VOC/gal), except:
 - (a)** Any topcoat or sealer sprayed with a conventional or other restricted use gun shall be expressed in lbs VOC/lb solids.
 - (b)** *Two VOC content values* must appear for each topcoat and each sealer that is expressed as grams VOC per liter or pounds VOC per gallon: both grams VOC/liter (lb VOC/gal) *including* water and non-precursor organic compounds, *and* grams VOC/liter (lb VOC/gal) *less* water and non-precursor organic compounds.



(4) **Other Coatings:** Use grams/liter (or lb/gal), or lbs VOC/lb solids for coatings that are neither sealers nor topcoats, such as washcoats, glazes, etc.

c. **Acceptable Format:** VOC-containing materials shall be listed neatly and completely. The following is an example of an acceptable method:

Example: Identify and list each VOC-containing material in one of the following 6 categories: 1. topcoats; 2. sealers; 3. catalyst/hardeners; 4. diluents, such as reducers, coating solvents and thinners; 5. cleaning and stripping solvents; and 6. other VOC-containing materials. Next to each material, record the VOC-content found on the container, an MSDS, an invoice, or other source.

d. **Mix Ratios:** A current list shall be maintained of the manufacturer's recommended mix ratio of components, including but not limited to adding reducers and catalyst/hardeners, except when the manufacturer has no recommendations for any additions.

501.2 Schedule for Recording Material Usage:

a. **Daily Updates for Non-Compliant Material:** The amount of each day's use of each topcoat, sealer or booth material that exceeds applicable VOC limits of Section 301 or Section 304 of this rule, shall be totaled and logged by the end of the following workday. VOC content shall be entered for each such material.

b. **Monthly Update for Materials Compliant with Sections 301 and 304:** By the end of the following month, an owner or operator shall update the following records for each month:

(1) For each topcoat and sealer to which reducer is added at any time after its arrival at a facility, enter the VOC content in lb VOC/lb solids or in grams/liter (lb/gal) less water and non-precursor organic compounds.

(2) The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.

(3) The quantity and type of organic solvent used each month for stripping and cleaning.

(4) The quantity of organic solvent disposed of offsite during the month just ended.

(5) **Exception:** Update yearly the totals of the usage of each VOC containing material known to be used in amounts less than 15 gallons (57 liters) per year.

c. **Semi-Annual Updates of Coatings Applied with Restricted Use Gun:** Records associated with the Section 302 limitations on the use of conventional air-atomized spray equipment and other restricted-use guns shall be kept. These records shall show for each semi-annual period the volume (VR) of finishing materials exceeding solids (1 lb VOC/ lb solids) (1 kg VOC/kg solids) applied with conventional air-atomized spray guns and other restricted use guns. In addition, the total volume of all finishing material (AMV) used throughout the facility shall be determined. The total volume (VR) so applied over the previous six-months is divided by the total of all coatings used in the same period (AMV) and these calculations and the result are entered in the log.



501.3 Disposal/Recovery: An owner or operator shall keep records of disposal/recovery of all VOC-containing materials.

5XX.Y **Small Source Status:** An operator of such an exempted facility shall keep on the premises current records of all coating related materials currently used, and their VOC content. For this purpose, a complete, updated set of receipts/invoices and Material Safety Data Sheets (MSDSs) will suffice if each receipt/invoice is retained on the premises at least two years.

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

502.1 Measurement of VOC content, pursuant to the VOC-limits of subsections 301.1, 301.2, and 302.2, and subsections 304.1 and 307.2c., shall be conducted and reported in accordance with EPA Test Method 24 (40 CFR 60, Appendix A). Acetone content shall be determined within the context of Method 24 by EPA Method 311 or other method acceptable to EPA. Multi-part coatings including those with reactive diluent(s) shall be tested by Method 24 procedures.

502.2 Measurement of air pressure at the center of the spray gun tip and air horns of a conventional air-atomized spray gun (reference Section 302) shall be performed using a device in proper working order supplied by the gun's manufacturer for performing such a measurement.

502.3 Measurement of mil thickness to determine compliance with single resin-layer finish parameters in Section 227 and ~~subsection~~ Section 307.2c. of this rule, shall be performed by draw bar and calculations using the weight and area of the film and the density of the cured coating solids, by a Tooke Inspection Gage according to the instructions of its manufacturer, or by other means used for the purpose by a major coating manufacturer's laboratory or quality control.

APPENDIX A TO RULE 342

AN AVERAGING ALTERNATIVE

- a. Purpose:** The averaging provisions of this Appendix to Rule 342 allow the owner or operator of a furniture coating facility, which meets eligibility requirements, increased options in choosing coating types. These provisions expand the range of the allowable VOC contents of coatings while limiting overall VOC emissions to amounts less than would be emitted at the VOC-content limits of subsection 301.1 of this rule.
- b. Eligibility to Apply:** The owner or operator of any furniture coating operation, reasonably capable of annually emitting more than 25 tons of VOC and having at least one of the following four statuses with respect to VOC emissions, may apply to average:
- (1) Has emitted more than 25 tons (21.7 Mg) of VOC in any year since 1989 and has a Maricopa County Air Quality Permit or is under consideration for such permit by the Control Officer;
 - (2) Has in its permit a VOC-emissions limit of 50 tons or more;
 - (3) Has applied for or received Title V status.
- c. How to Apply:** An applicant shall submit a request for eligibility to the Control Officer. This request shall include a summary of the chief reasons for requesting eligibility for averaging.



AQ-2015-004-Rule 342

Stakeholder Workshop: August 3, 2015

Contact: Cheri Dale – 602-506-3476

dalec@mail.maricopa.gov

Maricopa County Air Quality Dept.

Planning & Analysis Division

1001 N. Central Ave. Ste. 125

Phoenix, AZ 85004

- (1) The Control Officer shall provide a brief questionnaire eliciting responses intended to reveal whether the operator has sufficient understanding and preparation to successfully average. This questionnaire shall require a sample of their intended recordkeeping format along with calculations containing the expected amount and VOC-contents of coatings intended to be used in averaging.
- (2) The Control Officer may request confirmation, correction, or clarification from the owner or operator for responses to the questionnaire that are questionable; that appear unclear, erroneous, incomplete, or non-pertinent, or for which there is contrary evidence.
- (3) The owner or operator shall submit a correctly completed questionnaire, signed by a responsible officer of the facility, no later than 14 calendar days prior to the first day of averaging.
- (4) Control Officer approval of the completed questionnaire shall constitute an acceptance of application for minor permit revision. The Control Officer may request additional information characteristically required for minor revisions to the permits of wood furniture coaters as a class.
- (5) Control Officer approval does not necessarily constitute satisfaction of all federal requirements nor preempt the EPA Administrator's asserting a right of approval.

d. Definitions of Terms used in an Averaging Regime:

- (1) **CREDIT CONSUMING COATING (EXCEEDING COATING):** In an averaging regime, coating with average VOC content exceeding the neutral point for its particular coating type, such as topcoat, sealer, etc. A credit consuming coating requires the use of credit generating coating(s) in order that the combination of all coatings in use will not exceed the limit set by the left side of the averaging formula.
- (2) **CREDIT CONSUMING PIECE/EXCEEDING PIECE:** In an averaging regime, a piece of furniture which is a member of a model-line of furniture receiving such a high proportion of credit-consuming coating that when the VOC contents and coating quantities received by the model-line, are entered into an averaging formula of Section i., the sum yielded by the right side of the formula is consistently larger than the sum yielded by the left side of the formula.
- (3) **CREDIT GENERATING COATING:** A coating which has VOC content well below the neutral point and, thus, is used in an averaging regime to create surplus VOC credit(s) to offset the excess emissions of particular credit consuming coating(s).
- (4) **CREDIT GENERATING PIECE:** In an averaging regime, a piece of furniture which is a member of a model-line of furniture receiving so much credit generating coating that when the VOC contents and coating quantities, received by the model-line, are entered into an averaging formula, the sum yielded by the right side of the formula is consistently less than the sum yielded by the left side of the formula.
- (5) **NEUTRAL POINT:** The particular number representing the VOC content of a particular coating type having the mathematical property that if it is included in an averaging formula it has no effect on the numerical results of the formula, regardless of how much of the coating is used. The neutral point VOC content for each affected coating-type is as follows:

Using Formula 1:

Topcoat neutral point - 0.72 kg VOC/kg coating solids. (Stains, sealers, etc. do not appear in Formula 1)

Using Formula 2:

The neutral point VOC content for each of the 5 types of coating in Formula 2 is as follows:



Topcoat - 1.62 kg VOC/kg solids; sealer coat - 1.71; washcoat - 8.1; basecoat - 1.08

The neutral point for stains is expressed in kilograms VOC per liter of coating - 0.712 kg VOC/liter

e. Basic Requirements for all Averaging Regimes:

- (1) **Entire Workdays:** Averaging regimes must be in place for no less than an entire 24 hour period and at all times during such 24-hour period. Normally, a workday will be the calendar day in which work commences. However, an owner or operator may designate in writing a workday schedule beginning and ending at a specific time between 12 midnight and 4:30 AM if the last shift normally ends between midnight and 4:30 AM, unless the Control Officer issues written disapproval. The times of the averaging workday may be changed if written notification has been given the Control Officer at least five workdays before the start of the intended new schedule, and no communication of disapproval has been issued within this time by the Control Officer.
- (2) **Averaging Applies Plant-Wide:** An averaging regime applies throughout a facility to all production furniture coating occurring during all 24 hours of a workday for which an averaging regime is declared.
- (3) **No Exemption for Single Resin-Layer Finishes or Acid-Cured, Alkyd Amino Coatings:**
 - (a) In averaging regimes using Formula 2, for surfaces which receive in total only one application of film building coating, the neutral point for that coating shall be the same as that for a sealer, 1.71 kg VOC/kg solids, and it shall be totaled with sealers in the averaging formula.
 - (b) Acid-cured, alkyd amino coatings, with or without vinyl chemistry, shall have the same neutral points in Formula 2 as do other sealers and topcoats (1.71 and 1.62, respectively) and shall be totaled in with the other sealers and topcoats in Formula 2.
- (4) **Identifying Credit Consuming Models:** Each furniture/finish model must be identified which on average does not by itself (i.e., by the combination of all coatings it receives) meet the applicable averaging formula (and must be offset by models whose coatings generate VOC credits). The model name and/or code of each credit consuming model must be identified in a permanent record for that purpose, along with a designation indicating that the model produces excess emissions. This designation can be the average grams of VOC above the formula limit, the maximum grams above the limit, number of exceeding grams at the first standard deviation, relative risk, or other term(s) created by the owner or operator that fulfill this purpose for the facility.
- (5) **Exemption for Physically Separated Lines:**
 - (a) At the Control Officer's discretion, an exemption from the requirement that the entire facility participate when an averaging regime is in effect can be granted for an additional coating line if: Such a coating line is both physically separate from the operations involving averaging and all monitoring, recordkeeping, and coating equipment including coating reservoirs are kept separate from the monitoring, recordkeeping and coating equipment participating in an averaging regime. The burden of demonstration is on the owner or operator that there is no significant risk of confounding enforcement, monitoring, recordkeeping, and equipment activities between the lines.
 - (b) **Dual Averaging Regimes:** A facility which has received such a subsection e.(5)(a) exemption has the option of running each separated line using an averaging regime. However, all requirements of this rule must be complied with by each separated line.



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dalec@mail.maricopa.gov

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1001 N. Central Ave. Ste. 125
Phoenix, AZ 85004

- (6) **Declaration of Averaging:** On any day of a Control Officer presence at a facility permitted to average, the owner or operator shall correctly announce without delay whether an averaging regime is currently in effect, and on an averaging day shall also forthwith supply a listing of each coating participating in the averaging formula, along with the VOC content and the coating category of each.
- f. **Recordkeeping and Monitoring:** In addition to the requirements of Section 501 of this rule, an owner or operator shall do the following:

 - (1) **Daily List the Components:** Prior to applying any coating on an averaging day, a list shall be made of each coating name/code to be used that day in the averaging formula and its expected VOC content as applied. This list shall be available to the Control Officer without delay.
 - (2) **Daily calculation Deadline:** After each day using averaging, an owner or operator shall determine the results of averaging for that completed production day by midday on the next workday. These results shall be put into hardcopy in the same format that the owner or operator used in the approved application questionnaire. Some other format may be used if the Control Officer has given the format approval before beginning averaging.
 - (3) **Log in:** An owner or operator shall arrange and keep the hardcopy results of each day's averaging in a form that allows the results of each averaging day within the 13 months prior to a Control Officer visit to be accessed by the Control Officer without delay.
 - (4) **Content of Weekly Summary of Production-Coating:** By the end of the first shift of the workweek, totals for the workweek just completed shall be compiled as follows:

 - (a) For each model and color, the total number of furniture pieces coated;
 - (b) The name and quantity applied for each stain, washcoat, basecoat, sealer, topcoat, and diluent recorded. The quantity of stain shall be expressed in liters; the quantity of the other coatings expressed in kilograms;
 - (c) The VOC content for each such coating and diluent, expressed in kg VOC/kg solids; and the non-precursor organic compound (NP) content of each, expressed either in kg NP/kg solids or kg NP/kg coating-including-NP shall be recorded, except that the VOC content of each stain shall be expressed in kg VOC per liter of coating, including any water or non-precursors.
 - (d) **Monthly Totals for Non-Averaged Coatings:** For coatings that do not participate in the averaging formulas, the total kilograms used shall be updated monthly. Coatings of the same type may be totaled together under a single VOC-content value if their VOC contents are within $\pm 2\%$ of that value.
 - (5) **Handling Unavoidable Data Loss and Data Processing Equipment Malfunctions:** An owner or operator shall put an accounting system in continual effect that allows the retrieval or reconstruction of data. When data required by this rule is lost, the Control Officer shall be notified forthwith and such data shall be reconstructed and due calculations completed within two facility workdays. The Control Officer may request that a hardcopy of the retrieved information be provided him/her by the same clock time, two workdays hence.
 - (6) **Report Submittal Schedule:**

 - (a) **Semi-Annual Reports:** An owner or operator shall submit a summary of the records, including all exceedances, by July 20 for the first half of the year and by January 20 of the following year for the second half. Included shall be certified data sheets for coatings



whose VOC content is determined by the supplier and not directly by the facility, and a statement that the coatings for which certified data sheets are submitted were the coatings actually used. All the foregoing shall be certified to and signed by a responsible official of the facility.

- (b) **Initial Compliance Report:** Within 60 days after the third day ever of averaging, an owner or operator shall submit a report to the Control Officer containing all the elements required by subsection f.(6)(a) above.

g. Test Procedures and Requirements:

- (1) An owner or operator shall cause to be performed EPA Method 24 tests on a sample of each coating intended to be used in an averaging regime, prior to using such coating in any averaging regime. These samples shall be taken at three levels of dilution: prior to adding any diluent; with the minimum weight of solvent/diluent typically used; and with the maximum weight of solvent/diluent expected ever to be needed.
- (2) An acetone determination shall be made in conjunction with Method 24 using EPA Method 311 or other method approved by EPA at the three dilution levels stipulated in subsection g.(1).
- (3) **The Status of Certified Product Data Sheets:** After the initial Method 24 tests pursuant to subsection g.(1), an owner or operator may substitute the specific certified product data sheet, based on Method 24, for any coating for any of the three levels of dilution stipulated in subsection g.(1), in lieu of directly overseeing the Method 24 tests.
 - (a) However, a certified product data sheet is not valid and shall not be submitted if it is neither for a dilution level in subsection g.(1) nor for the actual dilution level of a coating as applied during averaging.
 - (b) When the results of a Method 24 test, performed pursuant to a Control Officer initiative or directive, differ from the certified product data sheet, the Control Officer may require an owner or operator to have Method 24 tests conducted at a testing facility agreed to by the Control Officer and may require that the results of such tests be the values used in calculating averages.

h. Sanctions:

- (1) If an exceedance of the limits of an averaging formula is determined to be in violation of this rule, at least two violations may be charged: at least one violation for exceeding the limits in subsection 301.1 and a separate violation for exceeding the limit determined by the averaging formula in Section i. of this Appendix. Unless the Control Officer chooses otherwise, the number of violations issued for an exceedance of an averaging limit shall be one greater than the number of exceeding coatings participating in the averaging formula. Each day the average is exceeded will be counted as a separate incident.
- (2) **Continuance:** The Control Officer may disallow an owner or operator the continuance of averaging at a facility which has failed to comply with one or more provisions of this Appendix on three separate days in any period of 12 consecutive months, or which has been found guilty of a major violation of such provisions, except as prohibited by other rule or statute.

i. Two Averaging Formulas: The following are the two mathematical formulas from which one may be chosen to be used for an averaging regime.

- (1) If topcoats consistently average less than 0.72 kg VOC per kg solids on a mass solid basis, an owner or operator may use Formula 1.



$$\sum_{i=1}^n 0.72(TC_i) \geq \sum_{i=1}^n ER_{TC_i}(TC_i) \quad \text{Formula 1}$$

(2) For other coating systems using averaging, Formula 2 shall be used.

$$\sum_{i=1}^n 1.62(TC_i) + 1.71(SE_i) + 8.1(WC_i) + 1.08(BC_i) + 0.712(ST_i) \geq \sum_{i=1}^n ER_{TC_i}(TC_i) + ER_{SE_i}(SE_i) + ER_{WC_i}(WC_i) + ER_{BC_i}(BC_i) + ER_{ST_i}(ST_i) \quad \text{Formula 2}$$

where:

- N = number of finishing materials participating in averaging;
- TC_i = kilograms of solids of topcoat i used;
- SE_i = kilograms of solids of sealer i used;
- WC_i = kilograms of solids of washcoat i used;
- BC_i = kilograms of solids of basecoat i used;
- ST_i = liters of stain i used (water and any non-precursor content are not subtracted);
- ER_{TC_i} = VOC content of topcoat i in kg VOC/kg solids, as applied;
- ER_{SE_i} = VOC content of sealer i in kg VOC/kg solids, as applied;
- ER_{WC_i} = VOC content of washcoat i in kg VOC/kg solids, as applied;
- ER_{BC_i} = VOC content of basecoat i in kg VOC/kg solids, as applied; and
- ER_{ST_i} = VOC content of stain i in kg VOC/liter, as applied.

j. Pre-RACT Coating use is Limited: If a coating was used before 1993, and is still used for the same purposes, and it had a VOC content then which is lower than the neutral point for that coating type, then that coating may only be used in the averaging equation if the coating is now lower in VOC than before 1993. If that coating is used in averaging, the left side of the averaging formula must reflect the pre-RACT VOC content and not the current RACT neutral point for that type of coating. To effect this, additional mathematical terms must be added, one on the left and one on the right side of the formula. For example, if one can prove one used a high solids topcoat at 1.5 kg VOC/kg solids before 1993 (the year regulation negotiations began) and now thin the same product less so that it is consistently less than 1.5 kg/kg, one can enter it as a separate term. It appears in the formula below as “1.5(TU)” where “TU” stands for the total kilograms of solids of this unique topcoat used during an averaging day. “TU” appears on both sides of the inequality sign. ER_U is the actual VOC content that was in this unique topcoat on a particular averaging day. Along with this, the meaning of the term (TC_i) becomes slightly altered to mean the total topcoat solids used of every other topcoat beside the unique topcoat “U”:

$$\sum_{i=1}^n 1.62(TC_i) + 1.5(TU) + 1.71(SE_i) + 8.1(WC_i) + 1.08(BC_i) + 0.712(ST_i) \geq \sum_{i=1}^n ER_{TC_i}(TC_i) + ER_U(TU) + ER_{SE_i}(SE_i) + ER_{WC_i}(WC_i) + ER_{BC_i}(BC_i) + ER_{ST_i}(ST_i)$$

Similarly, any other unique coatings that meet such requirements and are used in averaging must each have its own set of two terms inserted into the averaging formula. Moreover, once a pre-RACT coating is used in averaging, the term for its VOC content must stay in the equation as long as that pre-RACT coating is used,



even if one later needs to raise the VOC content of the pre-RACT coating to a level above its historical VOC content.

APPENDIX B – A SHORT-FORM OPTION

- a. Applicability:** This Appendix B to Rule 342 only applies to operators of facilities which have a permit or permit modification limiting VOC emissions from all wood furniture and millwork coating to less than 10 tons, and the permit or Control Officer states in writing that this Appendix B applies. For those facilities for which this Appendix B does apply, no provisions within Sections 301 through 501, inclusive, shall be used to substitute for provisions in this Appendix B. Facilities subject to this Appendix B are also subject to all of Sections 100, 200, and 502.
- b. Definitions:** For the purposes of this Appendix B, the following definition shall apply:
- (1) **MINUS EXEMPT MATERIALS (MINUS EXEMPTS):** Means the same as “less water and non-precursor organic compounds” in specifying VOC content.
- c. VOC Limits for Topcoats and Sealers**
- (1) **The Principal VOC Limits:** Meet either the lbs VOC/lb solids limit or the lbs VOC/gal, minus exempts, limit: **All sealers and topcoats: 2 lbs VOC/lb or 5.45 lb VOC/gal**
- (2) **VOC Tradeoff Options:** These 2 options each require special conditions.
- (a) **Low VOC topcoat with Higher VOC Sealer:**
Low VOC topcoat: 0.8 lb/lb OR 3.83 lb/gal limit for topcoat.
Higher VOC sealer: no VOC limit for sealer under such topcoat.
- (b) **One-Step Finish:**
Higher VOC combination sealer and topcoat: **3 lb/lb OR 6.0 lb/gal limit.**
- The 2 Conditions:
- I. A single wet application of either sealer or topcoat (not both)
- II. Thickness of the dry finish cannot exceed 3 dry mils, as determined by the test method in subsection 502.3.
- d. Spray Method Requirements:**
- (1) **Have Guns with Higher Transfer:** If you spray coating having over 1 lb VOC/lb you must use and have in evidence for an inspector at least one of the following onsite:
- Low pressure gun with less than 12 psig at tip. Examples: pure HVLP gun; a turbine gun.
 - Airless; includes air-assisted airless.
 - An electrostatic system.
- (2) **Green Tag Option:** Restriction on conventional guns and other restricted use guns:
- (a) **Green Tag Requirements:** A conventional air-atomized or other restricted use gun shall have a durable and visible green tag, sticker, or painted emblem, no less than 4 square inches in area on the gun or within 3 ft of the gun on the gun’s hose, or the facility is in violation. *But*, such a tag is not required at a facility having and using only coatings which contain less than 1 lb VOC/lb solids as applied. Coatings which have less than 4.30 lb VOC/gal (515 g/l) minus exempt materials also meet this requirement.



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dalec@mail.maricopa.gov

Maricopa County Air Quality Dept.

Planning & Analysis Division

1001 N. Central Ave. Ste. 125

Phoenix, AZ 85004

- (b) **Prohibition:** No coating over 1 lb VOC/lb solids may be applied with a conventional air-atomized or other restricted use gun. This prohibition includes, but is not limited to, traditional lacquers, washcoats, and low-solids stains. (“Conventional air-atomized gun” is defined in Section 208. “Restricted use gun” is defined in Section 225.)
- (3) **Exemptions from VOC and Spray-Method Limits:** Prepackaged aerosol spray in cans under 22 fl. oz., faux & metal-leaf finish are exempt from Appendix B’s subsections c.(1) and (2) and d.(1) and (2) as is any refinishing operation necessary for preservation, to return furniture to original condition, to replace missing furniture items to complete a matching set, or to produce custom replica furniture. But nothing exempted by the previous sentence is exempt from inventory of VOC emissions or from other provisions of this Appendix B.
- e. **Housekeeping Functions:**
- (1) **Keep Coatings, Cleaners, & Waste-Materials Covered:** Coatings and cleaners not in use, as well as waste coatings, cleaning materials including solvent-dipped rags, and solvent used to clean spray equipment must be collected into a closed container or a container which is closed immediately after receiving such material.
- (2) **Booth Cleaning:** If booth/components other than *metal* filters are cleaned with solvent, no solvent which is more than 3.8 lb/VOC per gallon (455 g/l) shall be used. However, up to 1 gallon of solvent over 3.8 lb VOC/gal may be used for cleaning a booth as part of replacing coating on the booth.
- f. **Records:** Keep a list of all VOC containing material with the name and amount of VOC in each: Express VOC content either as lb/lb or lb/gal. For topcoat and sealer contents which are expressed in lb VOC/gal, this must be minus water and non-precursors.
- (1) **If you ever do your own Reducing or Thinning of a Sealer or Topcoat:**
Keep a list of the maximum VOC content of any material after you thin it or add any additives at your facility.
- (2) **Keep Receipts for 5 Years** of the amount received for each VOC-containing material *and* of the amount of all VOC-*waste materials* sent for recycling or hazardous waste collection.
- (3) **What to Record and How often:** Record the amount in the following 4 categories, (a) to (d), noting either the amount “used” or the amount “received” since your last records update:
- (a) All coatings including topcoats, sealers, stains, etc., including all parts, catalysts, activators, additives, hardeners; (*not* reducers). If you use conventional guns at all, total *separately* the coatings having less than 1 lb VOC/lb;
- (b) All reducers and diluents to be used for reducing or diluting coatings (not cleaning);
- (c) All solvents, strippers, thinners, and VOC-containing materials used for cleaning and cleanup (not reducing); and
- (d) All other VOC containing materials connected with wood coating. Omit janitorial & building maintenance.
- (e) **How often to Update your Records:** Update the above items in (a), (b), (c), and (d) weekly if your total monthly *use* of all coatings and diluents [(a) + (b)] is 250 gallons or more. Otherwise, update monthly. You may record just once a year those types of materials you use less than 15 gallons of.



Example: I use 5 kinds of graining ink. Added all together, I use 14 gallons of all graining ink combined: I only have to update my graining inks once a year.

APPENDIX C TO RULE 342

ALTERNATIVE COMPLIANCE WITH SECTION 301 VOC-LIMITS AND/OR SECTION 302 SPRAY-METHOD RESTRICTIONS BY USING AN EMISSIONS CONTROL DEVICE

- a. Eligibility:** A person is allowed to meet the VOC limits of either or both subsections 301.1 and 301.2 by using an ECS which reduces VOC emissions overall, including capture and processing, by at least 81 percent by weight. Such an ECS may also be used to comply with subsection 302.2 spray method provisions.
- b. Operation and Maintenance (O&M) Plan Required for ECS:**
- (1) The owner or operator of an emission control system (ECS) used to meet the requirements of Section 301 of this rule shall provide the Control Officer with an Operation and Maintenance (O&M) Plan. This O&M Plan shall specify key system operating parameters, such as temperatures, pressures and/or flow rates, necessary to determine compliance with this rule, and describe in detail procedures and their frequency of implementation needed to maintain the ECS.
 - (2) The Control Officer's written approval of the O&M Plan is required. The owner or operator shall consistently implement all provisions of the O&M Plan.
 - (3) **Changes in Frequency:** Changes involving reduction in the frequency or extent of procedures or parameters in a Control Officer-approved O&M Plan shall have the written consent of the Control Officer prior to being implemented.
 - (4) **Other Changes:** An updated O&M Plan must be submitted to the Control Officer for review within 10 days of any changes not involving reduction in frequency or extent of procedures or parameters of an approved O&M Plan. Within five working days of a written disapproval of such changes, either the original O&M Plan shall be reinstated or an alternative plan, negotiated with the affected facility and approved in writing by the Control Officer, shall be instituted.
- c. Providing and Maintaining ECS Monitoring Devices:** Any person operating an emission control system (ECS) pursuant to subsection 301.3 of this rule shall install, maintain, and calibrate monitoring devices described in the O&M Plan submitted to the Control Officer pursuant to subsection b. of this appendix. The monitoring devices shall measure temperatures, pressures, rates of flow, or other operating conditions necessary to determine if air pollution control equipment is functioning properly.
- (1) **ECS Operation and Maintenance Records:** On each day that an ECS is used to comply with Section 301 of this rule, an owner or operator shall make a permanent record of the operating parameters of the key systems described in the O&M Plan. For each day or period in which the O&M Plan requires that maintenance be performed, a permanent record shall be made of the maintenance actions taken, within 24 hours of maintenance completion. An explanation shall be entered for scheduled maintenance that is not performed during the period designated in the O&M Plan.
 - (2) **Other Records Required when Complying Via ECS:** An owner or operator choosing to meet the requirements of Section 301 through the use of an ECS shall maintain, in addition to the monthly records required by subsection 501.2:

**AQ-2015-004-Rule 342**

Stakeholder Workshop: August 3, 2015

Contact: Cheri Dale – 602-506-3476

dalec@mail.maricopa.gov**Maricopa County Air Quality Dept.**

Planning & Analysis Division

1001 N. Central Ave. Ste. 125

Phoenix, AZ 85004

- (a) Daily documentation showing the VOC content of the finishing material, as applied, in pounds VOC/pound solids when solvent or other VOC is added to the finishing material before application.
- (b) Daily records showing the amount of coating, the amount of catalyst/hardener, and the amount of solvent, reducer, and/or diluent used.

d. Compliance Schedule for ECS: An owner or operator of a furniture coating facility shall have such facility in compliance per the following schedule. Total VOC emissions is the total VOC from all wood coating operations and associated cleaning processes. It includes millwork coating.

(1) **Sources Emitting 50 TPY:** Full compliance with all applicable requirements of this rule shall be by November 15, 1996, if such facility has applied for or received a Title V permit, its permit has a VOC-emissions limit of 50 tons or more, or which has had an aggregate VOC emission to atmosphere after December 31, 1989, of 50.0 tons (45.35 Mg) or more in any calendar year or 300 pounds (136 kg) or more in any day. In addition, an owner or operator shall provide the Control Officer with:

(a) Both proof of a binding contract for an ECS and a compliance plan by June 3, 1996, listing dates of completion of increments of progress toward meeting the requirements of subsection 301.3 of this rule.

(b) An O&M Plan for the ECS by November 15, 1996.

(2) **Other Sources:** A facility shall be in compliance with Section 302 by November 15, 1996 and with Section 301 by January 15, 1997 if its total VOC in each of the years 1990 through 1995 of less than 300 pounds (136 kg) in any day and 50.0 tons (45.35 MG) in any calendar year. In addition, the owner or operator shall provide the Control Officer with:

(a) Both proof of a binding contract for an ECS and a compliance plan by June 3, 1996, listing the dates of completing the increments of progress toward meeting the requirements of the subsection 301.3; and

(b) An O&M Plan for the ECS by January 2, 1997.

e. Test Methods for an ECS

(1) Control efficiency of an emission control device used to meet the requirements of Section 301 shall be determined according to EPA Reference Method 25 or an applicable submethod of Method 25 (Title 40, CFR Part 60, Appendix A).

(2) EPA Method 18 shall be used if specified by the Control Officer when a non-precursor organic compound is present in the input of a control device used to meet the requirement of Section 301.

(3) Capture efficiency of an emission control device used to meet the requirements of Section 301 shall be determined by mass balance in combination with ventilation/draft rate determinations done in accordance with subsection e.(4), following, or according to "Guidelines for Determining Capture Efficiency" January 9, 1995, Candace Sorrell, Source Characterization Group A, Office of Air Quality Planning and Standards, US EPA. This EPA document is available at the Maricopa County Air Quality Department, 1001 N. Central Ave., Phoenix, Arizona, 85004.

(4) Ventilation/draft rates of an emission control device used to meet the requirements of Section 301 shall be determined by EPA Methods 2, 2A, 2C, or 2D.

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 Rule 342
- Why Revising Rule
- Proposed Revisions
- Anticipated Timeline
- Review
- Questions



History

- Federal Level:
 - CTG
 - NESHAP
- County Level
 - 1996
 - 2013



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.



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.



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.



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.



Maricopa County

Air Quality Department

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?



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





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

**Stakeholder Workshop: Summary
AQ-2015-006-Rule 342
Coating Wood Furniture And Fixtures
August 3, 2015**

Attendees:

17 Stakeholders attended: Copperstate Cabinet Co, Legends Furniture, Oak Craft Inc, Oak Canyon Mfg Inc, Sherwin-Williams, Lorts, Trendwood Inc, SWCA Environmental Consultants, Geosyntec Consultants, AEM Consulting, and Ryley Carlock & Applewhite law firm
4 Staff attended: LiSa Kon-Permitting Division, Cheri Dale-P&A Division, Corky Martinkovic-P&A Division, and Johanna Kuspert-P&A Division

Comments:

1. Applicability: Why this industry?
2. Economic impact: What is the economic impact of this rule?
3. Emission reductions: Has any modeling been done for this industry? What is the actual amount of reduction Maricopa County is hoping to achieve?
4. VOC limits: Use of low VOC material drives up the costs
5. Operator training: Operator training is not going to achieve a huge reduction in VOC emissions
6. Alternative technology: Alternative technology is needed to "push the needle" very far

Next Steps:

Maricopa County will prepare the following for the next workshop:

- Reasonably Available Control Technology (RACT): Maricopa County will do more research re: RACT to determine if the limits are beyond RACT
- Emission reductions: Maricopa County will review emissions inventory for the emissions from this industry within Maricopa County
- VOC limits: Maricopa County will benchmark other agencies to see how they regulate VOCs re: coating wood furniture and fixtures and what their VOC limits are
- Alternative technology: Maricopa County will contact spray gun manufacturer's concerning alternative/new spray gun technology (low-pressure spray guns)