VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

RULE 74.3 - PAPER, FABRIC AND FILM COATING OPERATIONS
(Adopted 5/29/79, Revised 7/5/83, 3/27/90, 12/10/91)

A. Applicability

The provisions of this rule shall apply to any application process involving the coating of paper, fabric or film.

B. Requirements

1. No person shall use or apply coating material in any applicable application process unless:

   a. The coating material contains less than 265 grams of reactive organic compound material per liter of coating applied, less water and less exempt organic compounds; or

   b. Reactive organic compound emissions from the application process are less than 120 grams per liter of coating applied, less water and less exempt organic compounds. Compliance shall be determined on an inventory basis using a rolling 24 hour average; or

   c. Reactive organic compound emissions from the application process are reduced by a combined capture and destruction efficiency of no less than 90 percent, averaged over a rolling 24 hour period. Destruction efficiency shall be measured across an emission control device.

      If the coating applied contains more than 1200 grams of ROC per liter of coating applied, less water and less exempt solvent, then, in addition to the above, emissions shall be limited to 120 grams of ROC per liter of coating applied, less water and less exempt solvent, using a rolling 24 hour average.

2. Containers and mixing equipment not controlled pursuant to Subsection B.1.b or B.1.c and containing reactive organic compound material shall not leak and shall be covered when in use. Covers shall not be required when adding or removing material or during cleaning operations.

3. No person shall use clean-up solvent in any applicable operation unless:

   a. The solvent contains less than 200 grams of reactive organic compound per liter of material used; or

b. The reactive organic compound emissions from clean-up operations are less than 120 grams per liter of clean-up solvent used, as specified in Subsection B.1.b, or are collected and reduced as specified in Subsection B.1.c.

C. Exemptions

The provisions of Subsections B.1.b and B.1.c shall not apply during the first twenty-four (24) hours of a scheduled carbon adsorption system start-up. The District shall be notified no later than twenty-four (24) hours prior to any start-up performed pursuant to this provision. In addition, emissions shall be continuously monitored and a written excess emissions report shall be submitted to the District within ten (10) working days of the end of the occurrence. An operator shall invoke this provision no more than six (6) times in any one calendar year.

D. Recordkeeping Requirements

The operator of any operation subject to the provisions of Section B of this rule shall maintain records that include, at a minimum, the following data:

1. For Subsections B.1.a, B.1.b and B.3, formulation data for each coating, diluent or clean-up solvent used or applied, including name of supplier, name and identification number, total density in pounds per gallon, total volatiles content, water content, exempt solvent content, reactive organic compound content (all in weight percent), and the density of any solids applied.

2. For Subsection B.1.b, hourly coating consumption data, including coating identification number, amount of coating applied, diluent identification number, and amount of diluent used. For Subsection B.1.a, the same information is required on a daily basis.

3. For Subsection B.1.b, process information necessary to determine the volume of coating applied, less water and less exempt organic compounds.

4. For Subsection B.1.c, hourly control equipment data for each coating line, including control device in operation and capture and destruction efficiency.

5. For Subsection B.3.a, clean-up solvent consumption data, including solvent identification number and amount of solvent used, on a daily basis.

6. For Subsection B.3.b, daily solvent consumption data, including solvent identification number and amount of solvent used.

The operator shall maintain all records for a period of 2 years after the date of each entry. The records shall be available for inspection by the District upon request.

E. Test Methods

1. Reactive organic compound emissions for compliance source tests shall be determined by using ARB Method 100 or EPA Methods 18, 25 or 25A. Exempt organic compounds shall be determined by using ARB Method 422.

2. The reactive organic compound content of paper, fabric or film coating material shall be determined by using EPA Method 24. Exempt organic compounds shall be determined by using ARB Method 432.

3. Compliance with the capture efficiency requirements in Subsection B.1.c shall be based on criteria set forth in 40 CFR Part 60, Subpart SSS, Standards of Performance for New Stationary Sources; Magnetic Tape Manufacturing Industry; Final Rule, dated October 3, 1988.

F. Violations

Failure to comply with any provision of this rule shall constitute a violation of this rule.

G. Definitions

For the purpose of this Rule, the following definitions apply:

1. "Application process": Any portion of a paper, fabric or film coating operation where surface coatings are applied and/or cured, including the coating applicator and heating ovens.

2. "Clean-up solvent": Any solvent used in clean-up operations, excluding hand-wiping.

3. "Exempt organic compounds": Compounds listed in Rule 2 as exemptions to the definition of "Reactive organic compounds."

4. "Fabric coating": Any decorative or protective coating or reinforcing material applied on or impregnated into textile fabric, vinyl coated textile fabric, or vinyl sheets.

5. "Film coating": Any coating applied in a web coating process on any film substrate other than paper or fabric, including, but not limited to, typewriter ribbons, photographic film, magnetic tape, and metal foil gift wrap.

6. "Grams of ROC per liter, less water and less exempt organic compounds": The ROC content of a material, excluding water and excluding those compounds specified in the definition of "Reactive Organic Compounds" in Rule 2. The following equation shall be used to calculate ROC content:

$$\text{Grams of ROC per Liter of Coating Less Water and Less Exempt Compound} = \frac{Ws - Ww - Wes}{Vm - Vw - Ves}$$

where Ws = Weight of volatile compounds (grams)
Ww = Weight of water (grams)
Wes = Weight of exempt organic compounds (grams)
Vm = Volume of material (liters)
Vw = Volume of water (liters)
Ves = Volume of exempt organic compounds (liters)

7. "Grams of ROC per liter of material": The weight of ROC per volume of material. The following equation shall be used to calculate ROC content:

$$\text{Grams of ROC per liter of material} = \frac{Ws - Ww - Wes}{Vm}$$

where: Ws = Weight of volatile compounds in grams
Ww = Weight of water in grams
Wes = Weight of exempt compounds in grams
Vm = Volume of material in liters

8. "Inventory basis": The reactive organic compound emissions from the process, in grams, divided by the volume of coating solution input to the process, less water and less exempt organic compounds, in liters, over a specified time period.

For processes controlled by a carbon adsorption system, reactive organic compound emissions shall be determined from control device efficiency data (ratio of ROC concentration input to ROC concentration output) and the total amount of coating solution applied, from process records.

9. "Leak":

a. The dripping at a rate of more than three (3) drops per minute of liquid containing reactive organic compound material; or

b. An emission containing gaseous reactive organic compound material which causes an appropriate analyzer, when sampling one (1) centimeter from a source, to register at least 10,000 ppmv, as methane and as determined by EPA Reference Method 21. Excepted are emissions from pressure relief devices when the process pressure exceeds the limit setting specified for the device and emissions from pneumatic control valves required to bleed gas during valve activation; or

c. An emission containing gaseous reactive organic compound material which causes a soap bubble score of 3 or greater using the alternative screening procedure in EPA Reference Method 21. Excepted are

emissions from pressure relief devices when the process pressure exceeds the limit setting specified for the device and emissions from pneumatic control valves required to bleed gas during valve activation.

10. "Paper coating": Any coating applied on or impregnated into paper, including, but not limited to, adhesive tapes and levels, book covers, post cards, office copier paper, drafting paper, and pressure sensitive tape.