

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

August 6, 2013

Ms. Joyce Epps, Director  
Department of Environmental Protection  
Bureau of Air Quality  
Rachel Carson Building  
400 Market Street, P.O. Box 8468  
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed are a paper copy and an exact duplicate of this paper copy on a computer disk in searchable pdf file format of a revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the 8-Hour Ozone National Ambient Air Quality Standards. Changes made to Article XXI, Air Pollution Control Rules and Regulations, and County Ordinance 16782 are related to regulations incorporating CTGs for **Miscellaneous Metal and/or Plastic Parts Surface Coating Processes; Automobile and Light-Duty Truck Assembly Coatings; Miscellaneous Industrial Adhesives; and Fiberglass Boat Manufacturing Materials** - Sections 2105.83, 2105.84, 2105.85 and 2105.86 respectively, as well as well as related definitions in Section 2101.20 and existing Surface Coating Processes regulations at Section 2105.10. This SIP revision is being tracked as our internal Revision 74.

This SIP Revision was the subject of a public comment period from February 8, 2012 until March 14, 2012 the date of the public hearing. It was approved by the Board of Health on May 2, 2012, enacted by County Council on May 22, 2013, approved and signed by the Allegheny County Chief Executive on May 29, 2013, and became effective June 8, 2013.

We request that the Pennsylvania Department of Environmental Protection approve this revision and forward the paper copy and disk to the U.S. EPA Region III with a recommendation for approval. If you have any questions, please call me at the number below or email me at [jthompson@achd.net](mailto:jthompson@achd.net).

Sincerely,

James Thompson, Manager  
Air Quality Program

cc: Kirit Dalal  
Stephen Hepler  
Enclosures

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**Revision to ALLEGHENY COUNTY'S portion of the  
PENNSYLVANIA STATE IMPLEMENTATION PLAN**

**For the**

**Attainment and Maintenance of the National  
Ambient Air Quality Standards**

**Revision Tracking No. 74**

**Allegheny County Health Department  
Rules and Regulations  
Article XXI, Air Pollution Control**

**Changes to Article XXI Sections in the SIP:**

**§2101.20 Definitions,  
§2105.10 Surface Coating Processes,  
§2105.83 Control of VOC Emissions from Miscellaneous Metal and/or Plastic  
Parts Surface Coating Processes,  
§2105.84 Control of VOC Emissions from Automobile and Light-Duty Truck  
Assembly Coatings,  
§2105.85 Control of VOC Emissions from Miscellaneous Industrial Adhesives, and  
§2105.86 Control of VOC Emissions from Fiberglass Boat Manufacturing  
Materials**

## **Executive Summary**

### **Article XXI Regulation Changes for Ozone Control Techniques Guidelines (CTGs) December 2011**

The Clean Air Act requires that state implementation plans (SIPs) for ozone non-attainment areas include reasonably available control measures, including reasonably available control technologies (RACT), for sources of emissions. Control Techniques Guidelines (CTGs) are promulgated by the EPA to provide state and local air pollution control authorities information that should assist them in determining RACT. Air programs must revise their SIPs to include RACT for sources of Volatile Organic Compounds (VOC) emissions covered by a CTG. ACHD has adopted all applicable CTGs issued prior to 2006.

The four proposed regulation fulfill the County's requirements under four newer CTGs: Miscellaneous Metal and/or Plastic Parts Surface Coating Processes; Automobile and Light-Duty Truck Assembly Coatings; Miscellaneous Industrial Adhesives; and Fiberglass Boat Manufacturing Materials. These Article XXI proposed regulations have requirements identical to those of the federal CTGs.

- §2105.83      Miscellaneous Metal and/or Plastic Parts Surface Coating Processes refer to facilities that have a series of one or more coating applicators and an associated drying area and/or oven wherein a coating is applied, dried, and/or cured.
- §2105.84      Automobile and Light-Duty Truck Assembly Coatings refer to primary coatings applied to new automobile or new light-duty truck bodies, or body parts for new automobiles or new light-duty trucks and primary coatings applied to other parts that are coated along with these body parts.
- §2105.85      Miscellaneous Industrial Adhesives refer to facilities that have a series of one or more adhesive applicators and any associated drying area and/or oven wherein an adhesive is applied, dried, and/or cured.
- §2105.86      Fiberglass Boat Manufacturing Materials refer to facilities that manufacture hulls or decks of boats from fiberglass, or build molds to make fiberglass boat hulls or decks. This regulation does not apply to facilities that manufacture solely parts of boats, or boat trailers, however if the facility manufactures hulls or decks, or molds for hulls or decks, then the manufacture of all other fiberglass boat parts is covered under this regulation.

In each regulation, the source is required to either limit the amount of volatile organic chemicals in the coatings, adhesives, resins, gels or solvent used, or install and operate emissions control equipment. Some operations procedures and reporting requirements are included in the regulations. Also, Regulation §2105.10 Surface Coating Processes will be amended and definitions will be added to Regulation §2101.20 Definitions.

## ***Table of Contents***

1. Changes to Article XXI Rules and Regulations:
  - §2101.20, Definitions (SIP Change);**
  - §2105.10, Surface Coating Processes (SIP Change);**
  - §2105.83, Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes (SIP Change);**
  - §2105.84, Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings (SIP Change);**
  - §2105.85, Control of VOC Emissions from Miscellaneous Industrial Adhesives (SIP Change)**
  - §2105.86, Control of VOC Emissions from Fiberglass Boat Manufacturing Materials (SIP Change)**
2. Technical Support Document
3. Documentation of Public Hearing and Certifications
  - Public hearing notice
  - Transmittals of hearing notice to EPA & PA DEP
  - Proof of publication of notice of hearing
  - Certification of hearing
  - Summary of Comments and responses
  - Certifications of approval and adoption

## 1. Article XXI Changes

<b><u>ALL NEW TEXT</u></b>
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### § 2101.20 DEFINITIONS

**“General Multi-Component Coating”** means a coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film. *{effective January 1, 2014}*

**“General One Component Coating”** means 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. *{effective January 1, 2014}*

**“Solids turnover ratio ( $R_T$ )”** means the ratio of the total volume of coating solids that is added to the electrodeposited primer system in a calendar month divided by the total volume design capacity of the electrodeposited primer system. *{effective January 1, 2014}*

**Additions are shown bolded and underlined.**

**§ 2105.10 SURFACE COATING PROCESSES**

- a. **Applicability.** This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.
1. The limits from § 2105.10 and Table § 2105.10, number 7 for Metal furniture coating and number 9 for Large appliance coating, no longer apply to the large appliance and metal furniture surface coating process as of January 1, 2011.
  2. The limits from § 2105.10 and Table § 2105.10, number 5 for Paper coating, no longer apply to the paper, film, and foil surface coating process as of January 1, 2011.
  - 3. The limits from § 2105.10 and Table § 2105.10, number 10 for Miscellaneous metal parts and products, no longer apply to miscellaneous metal and/or plastic parts surface coating processes as of January 1, 2014.**
  - 4. The limits from § 2105.10 and Table § 2105.10, number 6 for Automobile and light duty truck coating, no longer apply to automobile and light-duty truck assembly coatings as of January 1, 2014.**

. . .

**ALL NEW TEXT**

**§ 2105.83 CONTROL OF VOC EMISSIONS FROM MISCELLANEOUS METAL AND/OR PLASTIC PARTS SURFACE COATING PROCESSES**

- a. **Applicability.** Beginning January 1, 2014, this section applies to the owner or operator of a miscellaneous metal parts and/or plastic parts surface coating processes, where the total actual VOC emissions from all miscellaneous metal parts and/or plastic parts surface coating processes, including related cleaning activities, at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period, before controls.

The provisions of this rule shall not apply to the following source categories listed for regulation under Section 183(e) of the Clean Air Act:

1. Shipbuilding and repair coatings;
2. Aerospace coatings;
3. Wood furniture coatings;
4. Metal furniture coatings;
5. Large appliance coatings;
6. Auto and light-duty truck assembly coatings;
7. Flat wood paneling coatings;
8. Miscellaneous industrial adhesives;
9. Fiberglass boat manufacturing materials;
10. Paper, film, and foil coatings; or

Can coatings, coil coatings or magnet wire coatings which are not listed under Section 183(e) of the Act, but were addressed by regulation § 2105.10.

- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal parts and/or plastic parts surface coating processes, unless one of the following limitations is met:
1. The VOC content of each applied coating is equal to or less than the standard specified in Table 2105.83.1.
    - A. The VOC content, minus exempt compounds, of the applied coating, expressed in units of weight of VOC per volume of total nonexempt material, shall be calculated as follows:

$$\text{VOC} = \frac{W_s - W_w - W_{ex}}{V_m - V_w - V_{ex}}$$

Where:

- VOC = VOC content, minus exempt compounds, in lb (g) VOC / gal (l) of materials, minus exempt compounds
- $W_s$  = Weight of all volatile material in pounds (g), including VOC, water, non-precursor organic compounds and dissolved vapors
- $W_w$  = Weight of water in pounds (g)
- $W_{ex}$  = Weight of exempt solvent(s) in pounds (g)
- $V_m$  = Volume of total material, as applied in gallons (l)
- $V_w$  = Volume of water in gallons (l)
- $V_{ex}$  = Volume of exempt solvent(s) in gallons (l)

- B. The VOC content limits of subparagraph A may be met by averaging the VOC content of materials used on a single application unit for each day (i.e., daily within-application unit averaging).
- C. Sampling and testing shall be done in accordance with the procedures and test methods specified in Part G (Methods).
2. The VOC content limitations based on low-VOC coatings as specified in Table 2105.83.2 of this rule, the use of add-on pollution control equipment to meet the VOC content limitations, and the use of an application method specified in Subsection e of this rule.
- A. The VOC content, minus exempt compounds, of the applied coating, expressed in units of weight of VOC per volume of total material, shall be calculated as follows:

$$\text{VOC} = \frac{W_s - W_w - W_{ex}}{V_m}$$

Where:

- VOC = VOC content, minus exempt compounds, in lb (g) VOC / gal (l) of materials
- $W_s$  = Weight of all volatile material in pounds (g), including VOC, water, non-precursor organic compounds and dissolved vapors
- $W_w$  = Weight of water in pounds (g)
- $W_{ex}$  = Weight of exempt solvent(s) in pounds (g)
- $V_m$  = Volume of total material, as applied in gallons (l)



- B. The VOC content limits of subparagraph A may be met by averaging the VOC content of materials used on a single application unit for each day (i.e., daily within-application unit averaging).
  - C. Sampling and testing shall be done in accordance with the procedures and test methods specified in Part G (Methods).
- 3. The overall weight of VOC emitted to the atmosphere is reduced through the use of an oxidizer, adsorber, absorber, concentrator, or another add-on control which is acceptable under § 2105.01 (Equivalent Compliance Techniques). The overall control system, as determined by the test methods and procedures specified in Part G, shall be no less than 90%.
- c. **Records.** A facility, regardless of the facility's annual emission rate, which contains miscellaneous metal parts and/or plastic parts surface coating processes, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
  - 1. The following parameters for each coating and other component as supplied:
    - A. The coating, thinner or component name and identification number;
    - B. The volume used;
    - C. The mix ratio;
    - D. The density or specific gravity;
    - E. The weight percent of total volatiles, water, and exempt solvents;
    - F. The volume percent of total materials, water, and exempt solvents for either Table 2105.83.1 or Table 2105.83.2 for miscellaneous metal parts and/or plastic parts surface coating processes.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.
- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No miscellaneous metal parts and/or plastic parts surface coating processes which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.
- e. **Application Techniques.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of miscellaneous metal parts and/or plastic parts surface coatings unless the coatings are applied using one or more of the following application methods:
  - 1. Airless spraying;
  - 2. Air-assisted airless spraying;
  - 3. Electrostatic spraying;

4. High volume-low pressure (HVLP) spraying;
5. Dip coating, including electrodeposition;
6. Flow coating;
7. Roll coating;
8. Autophoretic coating;
9. Zinc-arc spraying;
10. Other coating application method that the person demonstrates and the Department determines achieves emission reductions equivalent to HVLP spraying.

f. **Exempt Other.**

1. The following shall be exempt from this regulation:
  - A. Aerosol coatings;
  - B. Architectural coatings;
  - C. Automobile refinish coatings;
  - D. The coating of bodies and/or body parts for new heavier vehicles where the owner or operator elects to comply with the requirements of regulation § 2105.84 CONTROL OF VOC EMISSIONS FROM AUTOMOBILE AND LIGHT-DUTY TRUCK ASSEMBLY COATINGS.
2. The following metal parts coatings and coating operations shall be exempt from the limitations set by Subsection b, and Subsection e, Application Techniques but shall still comply with Subsection h, Housekeeping:
  - A. Stencil coatings;
  - B. Safety-indicating coatings;
  - C. Solid-film lubricants;
  - D. Electric-insulating and thermal-conducting coatings;
  - E. Magnetic data storage disk coatings;
  - F. Plastic extruded onto metal parts to form a coating.
3. The following plastic parts coatings and coating operations shall be exempt from the limitations set by Subsection b, but shall still comply with Subsection e, Application Techniques and Subsection h, Housekeeping:
  - A. Touch-up and repair coatings;
  - B. Stencil coatings applied on clear or transparent substrates;
  - C. Clear or translucent coatings;
  - D. Coatings applied at a paint manufacturing facility while conducting performance tests on the coating;
  - E. Any individual coating category used in volumes less than 50 gallons in any one year, if substitute compliant coatings are not available, provided that the total usage of all such coatings does not exceed 200 gallons per year, per facility;

- F. Reflective coating applied to highway cones;
  - G. Mask coatings that are less than 0.5 millimeter thick (dried) and the area coated is less than 25 square inches;
  - H. Electromagnetic interference/radio frequency interference (EMI/RFI) shielding coatings;
  - I. 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.
4. The following automotive/transportation and business machine plastic part coatings and coating operations shall be exempt from the limitations set by Subsection b, but shall still comply with Subsection e, Application Techniques and Subsection h, Housekeeping:
- A. Texture coatings;
  - B. Vacuum metalizing coatings;
  - C. Gloss reducers;
  - D. Texture topcoats;
  - E. Adhesive primers;
  - F. Electrostatic preparation coatings;
  - G. Resist coatings;
  - H. Stencil coatings.
5. The application techniques in Subsection e of this rule do not apply to the following:
- A. For metal parts coatings; touch-up coatings, repair coatings, and textured finishes.
  - B. For plastic parts coatings; airbrush operations using five gallons or less of coating per year.
  - C. For pleasure craft surface coating operations; extreme high gloss coatings.
- g. **Emission Limitations.** For those who elect to adopt the limitation from Subparagraph b.1, if more than one emission limitation in Table 2105.83.1 for miscellaneous metal parts and/or plastic parts applies to a specific coating, the least stringent emission limitation applies. For those who elect to adopt the limitation from Subparagraph b.2, if more than one emission limitation in Table 2105.83.2 for miscellaneous metal parts and/or plastic parts applies to a specific coating, the least stringent emission limitation applies.
- h. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of a miscellaneous metal parts and/or plastic parts surface coating processes:
- 1. Store all VOC-containing coatings, thinners, coating-related waste materials, cleaning materials and used shop towels in closed containers.

2. Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating-related waste materials and cleaning materials are kept closed at all times except when depositing or removing these materials.
  3. Minimize spills of VOC-containing coatings, thinners, coating-related waste materials and cleaning materials, cleaning up spills immediately.
  4. Convey VOC-containing coatings, thinners, coating-related waste materials and cleaning materials from one location to another in closed containers or pipes.
- i. **Measurements.** Measurements of the volatile fraction of coatings, other than reactive coatings, used at facilities operating miscellaneous metal parts and/or plastic parts surface coating processes shall be performed according to the applicable procedures established in § 2107.04 of this Article.

**Table 2105.83.1**  
**Emission Limits of VOCs for Miscellaneous Metal and/or Plastic Surface Coatings**

**Limits as Applied**      **Mass of VOC per volume of coating (minus exempt compounds)**

<b>Metal Parts and Products VOC Content Limits</b> <u>Coating Category</u>	Air Dried		Baked	
	<u>kg/l</u>	<u>lb/gal</u>	<u>kg/l</u>	<u>lb/gal</u>
General One Component	0.34	2.8	0.28	2.3
General Multi-Component	0.34	2.8	0.28	2.3
Camouflage	0.42	3.5	0.42	3.5
Electric-Insulating Varnish	0.42	3.5	0.42	3.5
Etching Filler	0.42	3.5	0.42	3.5
Extreme High-Gloss	0.42	3.5	0.36	3.0
Extreme Performance	0.42	3.5	0.36	3.0
Heat-Resistant	0.42	3.5	0.36	3.0
High Performance Architectural	0.74	6.2	0.74	6.2
High Temperature	0.42	3.5	0.42	3.5
Metallic	0.42	3.5	0.42	3.5
Military Specification	0.34	2.8	0.28	2.3
Mold-Seal	0.42	3.5	0.42	3.5
Pan Backing	0.42	3.5	0.42	3.5
Prefabricated Architectural Multi-Component	0.42	3.5	0.28	2.3
Prefabricated Architectural One Component	0.42	3.5	0.28	2.3
Pretreatment	0.42	3.5	0.42	3.5
Repair and Touch-Up	0.42	3.5	0.36	3.0
Silicone Release	0.42	3.5	0.42	3.5
Solar-Absorbent	0.42	3.5	0.36	3.0
Vacuum-Metalizing	0.42	3.5	0.42	3.5
Drum Coating, New, Exterior	0.34	2.8	0.34	2.8
Drum Coating, New, Interior	0.42	3.5	0.42	3.5
Drum Coating, Reconditioned, Exterior	0.42	3.5	0.42	3.5
Drum Coating, Reconditioned, Interior	0.50	4.2	0.50	4.2

**Plastic Parts and Products VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
General One Component	0.28	2.3
General Multi-Component	0.42	3.5
Electric Dissipating and Shock-Free	0.80	6.7
Extreme Performance (2-pack coatings)	0.42	3.5
Metallic	0.42	3.5
Military Specification (1-pack coatings)	0.34	2.8
Military Specification (2-pack coatings)	0.42	3.5
Mold-Seal	0.76	6.3
Multi-colored Coatings	0.68	5.7
Optical Coatings	0.80	6.7
Vacuum-Metalizing	0.80	6.7

**Automotive Transportation and Business Machine Plastic Parts VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
--Automotive Transportation Coatings*--		
High Bake – Interior and Exterior Parts		
Flexible Primer	0.54	4.5
Non-Flexible Primer	0.42	3.5
Basecoat	0.52	4.3
Clearcoat	0.48	4.0
Non-Basecoat/Clearcoat	0.52	4.3
Low Bake/Air Dried – Exterior Parts		
Primer	0.58	4.8
Basecoat	0.60	5.0
Clearcoat	0.54	4.5
Non-Basecoat/Clearcoat	0.60	5.0
Low Bake/Air Dried – Interior Parts		
Touch-Up and Repair	0.62	5.2
--Business Machine Coatings--		
Primers	0.35	2.9
Topcoat	0.35	2.9
Texture Coat	0.35	2.9
Fog Coat	0.26	2.2
Touch-Up and Repair	0.35	2.9

\* For red, yellow, and black automotive coatings, except touch-up and repair coatings, the limit is determined by multiplying the appropriate limit in this section of the table by 1.15

**Pleasure Craft Surface Coating VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
Extreme High-Gloss Topcoat	0.49	4.1
High-Gloss Topcoat	0.42	3.5
Pretreatment Wash Primers	0.78	6.5
Finish Primer/Surfacer	0.42	3.5
High-Build Primer Surfacer	0.34	2.8
Aluminum Substrate Antifoulant	0.56	4.7
Other Substrate Antifoulant	0.33	2.8
All Other Pleasure Craft Surface Coatings for Metal or Plastic	0.42	3.5

**Motor Vehicle Materials VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
Motor Vehicle Cavity Wax	0.65	5.4
Motor Vehicle Sealer	0.65	5.4
Motor Vehicle Deadener	0.65	5.4
Motor Vehicle Gasket/Gasket Sealing Material	0.20	1.7
Motor Vehicle Underbody	0.65	5.4
Motor Vehicle Truck Interior	0.65	5.4
Motor Vehicle Bedliner	0.20	1.7
Motor Vehicle Lubricating Wax/Compound	0.70	5.8

**Table 2105.83.2**  
**Emission Limits of VOCs for Miscellaneous Metal and/or Plastic Surface Coatings**  
**with Applicable Add-on Controls**

<b><u>Limits as Applied</u></b>	<b><u>Mass of VOC per volume solids</u></b>			
<b>Metal Parts and Products VOC Content Limits</b>	Air Dried		Baked	
<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>	<u>kg/l</u>	<u>lb/gal</u>
General One Component	0.54	4.52	0.40	3.35
General Multi-Component	0.54	4.52	0.40	3.35
Camouflage	0.80	6.67	0.80	6.67
Electric-Insulating Varnish	0.80	6.67	0.80	6.67
Etching Filler	0.80	6.67	0.80	6.67
Extreme High-Gloss	0.80	6.67	0.61	5.06
Extreme Performance	0.80	6.67	0.61	5.06
Heat-Resistant	0.80	6.67	0.61	5.06
High Performance Architectural	4.56	38.0	4.56	38.0
High Temperature	0.80	6.67	0.80	6.67
Metallic	0.80	6.67	0.80	6.67
Military Specification	0.54	4.52	0.40	3.35
Mold-Seal	0.80	6.67	0.80	6.67
Pan Backing	0.80	6.67	0.80	6.67
Prefabricated Architectural Multi-Component	0.80	6.67	0.40	3.35
Prefabricated Architectural One Component	0.80	6.67	0.40	3.35
Pretreatment	0.80	6.67	0.80	6.67
Silicone Release	0.80	6.67	0.80	6.67
Solar-Absorbent	0.80	6.67	0.61	5.06
Vacuum-Metalizing	0.80	6.67	0.80	6.67
Drum Coating, New, Exterior	0.54	4.52	0.54	4.52
Drum Coating, New, Interior	0.80	6.67	0.80	6.67
Drum Coating, Reconditioned, Exterior	0.80	6.67	0.80	6.67
Drum Coating, Reconditioned, Interior	1.17	9.78	1.17	9.78
<b>Plastic Parts and Products VOC Content Limits</b>				
<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>		
General One Component	0.40	3.35		
General Multi-Component	0.80	6.67		
Electric Dissipating and Shock-Free	8.96	74.7		
Extreme Performance (2-pack coatings)	0.80	6.67		
Metallic	0.80	6.67		
Military Specification (1-pack coatings)	0.54	4.52		
Military Specification (2-pack coatings)	0.80	6.67		
Mold-Seal	5.24	43.7		
Multi-colored Coatings	3.04	25.3		
Optical Coatings	8.96	74.7		
Vacuum-Metalizing	8.96	74.7		

**Automotive Transportation and Business Machine Plastic Parts VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
--Automotive Transportation Coatings*--		
High Bake – Interior and Exterior Parts		
Flexible Primer	1.39	11.58
Non-Flexible Primer	0.80	6.67
Basecoat	1.24	10.34
Clearcoat	1.05	8.76
Non-Basecoat/Clearcoat	1.24	10.34
Low Bake/Air Dried – Exterior Parts		
Primer	1.66	13.80
Basecoat	1.87	15.59
Clearcoat	1.39	11.58
Non-Basecoat/Clearcoat	1.87	15.59
Low Bake/Air Dried – Interior Parts		
Touch-Up and Repair	2.13	17.72
--Business Machine Coatings--		
Primers	0.57	4.80
Topcoat	0.57	4.80
Texture Coat	0.57	4.80
Fog Coat	0.38	3.14
Touch-Up and Repair	0.57	4.80

\* For red, yellow, and black automotive coatings, except touch-up and repair coatings, the limit is determined by multiplying the appropriate limit in this section of the table by 1.15

**Pleasure Craft Surface Coating VOC Content Limits**

<u>Coating Category</u>	<u>kg/l</u>	<u>lb/gal</u>
Extreme High-Gloss Topcoat	1.10	9.2
High-Gloss Topcoat	0.80	6.7
Pretreatment Wash Primers	6.67	55.6
Finish Primer/Surfacer	0.80	6.7
High-Build Primer Surfacer	0.55	4.6
Aluminum Substrate Antifoulant	1.53	12.8
Other Substrate Antifoulant	0.53	4.4
All Other Pleasure Craft Surface Coatings for Metal or Plastic	0.80	6.7



**ALL NEW TEXT**

**§ 2105.84 CONTROL OF VOC EMISSIONS FROM AUTOMOBILE AND LIGHT-DUTY TRUCK ASSEMBLY COATINGS**

- a. **Applicability.** Beginning January 1, 2014, this section applies to the owner or operator of an automobile and/or light-duty truck assembly coating operation, where the total actual VOC emissions from all automobile and/or light-duty truck assembly coating operations, including related cleaning activities, at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period, before controls.
- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from an automobile and/or light-duty truck assembly coating operation, unless one of the following limitations is met:
1. The VOC content of each assembly coating process and applied material coating is equal to or less than the standard specified in Table 2105.84.
    - A. The VOC content, minus exempt compounds, of the applied coating, expressed in units of weight of VOC per volume of total nonexempt material, shall be calculated as follows:

$$\text{VOC} = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Where:

- VOC = VOC content, minus exempt compounds, in lb (g) VOC / gal (l) of materials, minus exempt compounds
- $W_s$  = Weight of all volatile material in pounds (g), including VOC, water, non-precursor organic compounds and dissolved vapors
- $W_w$  = Weight of water in pounds (g)
- $W_{es}$  = Weight of all non-precursor compounds in pounds (g)
- $V_m$  = Volume of total material, as applied in gallons (l)
- $V_w$  = Volume of water in gallons (l)
- $V_{es}$  = Volume of all non-precursor compounds in gallons (l)

2. The overall weight of VOC emitted to the atmosphere is reduced through the use of an oxidizer, adsorber, or another add-on control which is acceptable under

§ 2105.01 (Equivalent Compliance Techniques). The overall control system, as determined by the test methods and procedures specified in Part G, shall be no less than 85%.

- c. **Records.** A facility, regardless of the facility's annual emission rate, which contains an automobile and/or light-duty truck assembly coating operation, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
  - 1. The following parameters for each coating, thinner and other component as supplied:
    - A. The coating, thinner or component name and identification number;
    - B. The volume used;
    - C. The mix ratio;
    - D. The density or specific gravity;
    - E. The weight percent of total volatiles, water, and exempt solvents;
    - F. The volume percent of total solids, water, and exempt solvents for Table 2105.84 automobile and/or light-duty truck assembly coating operation.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No automobile and/or light-duty truck assembly coating operation which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.
- e. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of an automobile and/or light-duty truck assembly coating operation:
  - 1. Store all VOC-containing coatings, thinners, coating-related waste materials, cleaning materials and used shop towels in closed containers.
  - 2. Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials.
  - 3. Minimize spills of VOC-containing coatings, thinners, coating-related waste materials, and cleaning materials, cleaning up spills immediately.
  - 4. Convey VOC-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes.

5. Minimize VOC emissions from cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
6. Develop and implement a work practice plan to minimize VOC emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits are specified in this regulation. The plan shall specify practices and procedures to ensure that VOC emissions from the following operations are minimized:
  - A. Vehicle body wiping;
  - B. Coating line purging;
  - C. Flushing of coating systems;
  - D. Cleaning of spray booth grates;
  - E. Cleaning of spray booth walls;
  - F. Cleaning of spray booth equipment;
  - G. Cleaning of external spray booth areas; and
  - H. Other housekeeping measures.
- f. **Measurements.** Measurements of the volatile fraction of coatings, other than reactive coatings, used at automobile and/or light-duty truck assembly coating facilities shall be performed according to the applicable procedures established in § 2107.04 of this Article.

**Table 2105.84**  
**VOC Emission Limits for Automobile and/or Light-duty Truck Assembly Coatings**  
(pounds VOC per gallon or grams VOC per liter coating solids applied)

<b><u>Assembly Coating Process</u></b>	<b><u>VOC Emission Limit</u></b>	
	<u>lb/gal</u>	<u>g/l</u>
Electrodeposition primer operation when solids turnover ratio ( $R_T$ ) $\geq 0.16$ (including application area, spray/rinse stations, and curing oven)	0.7	84
Electrodeposition primer operation when $0.040 \leq (R_T) < 0.16$ (including application area, spray/rinse stations, and curing oven)	$0.7 * 350^{0.160 - R_T}$	$84 * 350^{0.160 - R_T}$
Electrodeposition primer operation when ( $R_T$ ) $< 0.040$ (including application area, spray/rinse stations, and curing oven)	No VOC emission limit	
Primer-surfacer operations (including application area, flash-off area, and oven)	12.0	1,440
Topcoat operations (including application area, flash-off area, and oven)	12.0	1,440
Final repair operations	4.8	580
Combined primer-surfacer and topcoat operations	12.0	1,440

**VOC Emission Limits for Miscellaneous Materials Used at Automobile and/or Light-duty  
Truck Assembly Coating Facilities**  
(pounds VOC per gallon or grams VOC per of liter coating excluding water and exempt compounds, as applied)

<b><u>Material</u></b>	<b><u>VOC Emission Limit</u></b>	
	<u>lb/gal</u>	<u>g/l</u>
Automobile and light-duty truck glass bonding primer	7.5	900
Automobile and light-duty truck adhesive	2.1	250
Automobile and light-duty truck cavity wax	5.4	650
Automobile and light-duty truck sealer	5.4	650
Automobile and light-duty truck deadener	5.4	650
Automobile and light-duty truck gasket/gasket sealing material	1.7	200
Automobile and light-duty truck underbody coating	5.4	650
Automobile and light-duty truck trunk interior coating	5.4	650
Automobile and light-duty truck bedliner	1.7	200
Automobile and light-duty truck weatherstrip adhesive	6.3	750
Automobile and light-duty truck lubricating wax/compound	5.8	700

**ALL NEW TEXT**

**§ 2105.85 CONTROL OF VOC EMISSIONS FROM MISCELLANEOUS INDUSTRIAL ADHESIVES**

- a. **Applicability.** Beginning January 1, 2014, this section applies to the owner or operator of a miscellaneous industrial adhesive application process, where the total actual VOC emissions from all miscellaneous industrial adhesives, including related cleaning activities, at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period, before controls.
- b. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous industrial adhesive process, unless one of the following limitations is met:
1. The VOC content of each applied adhesive is equal to or less than the standard specified in Table 2105.85.

- A. The VOC content, minus exempt compounds, of the applied adhesive, expressed in units of weight of VOC per volume of total nonexempt material, shall be calculated as follows:

$$\text{VOC} = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Where:

VOC = VOC content, minus exempt compounds, in lb (g) VOC / gal (l) of materials, minus exempt compounds

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

$W_w$  = Weight of water in pounds (g)

$W_{es}$  = Weight of all non-precursor compounds in pounds (g)

$V_m$  = Volume of total material, as applied in gallons (l)

$V_w$  = Volume of water in gallons (l)

$V_{es}$  = Volume of all non-precursor compounds in gallons (l)

- B. The VOC content limits of subparagraph A may be met by averaging the VOC content of materials used on a single application unit for each day (i.e., daily within-application unit averaging).

2. The overall weight of VOC emitted to the atmosphere is reduced through the use of an oxidizer, adsorber, absorber or another add-on control which is acceptable under § 2105.01 (Equivalent Compliance Techniques). The overall control system, as determined by the test methods and procedures specified in Part G, shall be no less than 85%.
  3. A combination of the methods listed in paragraphs 1 and 2.
- c. **Records.** A facility, regardless of the facility's annual emission rate, which contains miscellaneous industrial adhesive application processes, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
1. The following parameters for each adhesive and other component as supplied:
    - A. The name and identification number of each adhesive, or component;
    - B. The volume used;
    - C. The mix ratio;
    - D. The density or specific gravity;
    - E. The weight percent of total volatiles, water, and exempt solvents;
    - F. The volume percent of total materials, water, and exempt solvents for Table 2105.86 miscellaneous industrial adhesives.

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- d. **Exempt Solvents.** The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this Section. No miscellaneous industrial adhesive application process which seeks to comply with this Section through the use of an exempt solvent may be included in any alternative standard approved pursuant to this Article.
- e. **Application Techniques.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from the application of miscellaneous industrial adhesives unless the adhesives are applied using one or more of the following application methods:
1. Electrostatic spraying;
  2. High volume-low pressure (HVLP) spraying;
  3. Flow coating;
  4. Dip coating, including electrodeposition;
  5. Airless spraying;
  6. Air-assisted airless spraying;
  7. Roll coating or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application;

8. Other adhesive application method that the person demonstrates and the Department determines achieves emission reductions equivalent to HVLP spraying.
- f. **Exempt Other.** The following shall be exempt from the limitations set by Subsection b, but shall still comply with the Subsection h, Housekeeping:
1. Adhesives or adhesive primers being tested or evaluated in any research and development, quality assurance, or analytical laboratory.
  2. Adhesives or adhesive primers used in the assembly, repair, or manufacture of aerospace or undersea-based weapon systems.
  3. Adhesives or adhesive primers used in medical equipment manufacturing operations.
  4. Cyanoacrylate adhesive application processes.
  5. Aerosol adhesive and aerosol adhesive primer application processes.
  6. Processes using polyester bonding putties to assemble fiberglass parts at fiberglass boat manufacturing facilities and at other reinforced plastic composite manufacturing facilities.
  7. Processes using adhesives and adhesive primers that are supplied to the manufacturer in containers with a net volume of 16 ounces or less, or a net weight of one pound or less.
- g. **Emission Limitations.** If an adhesive is used to bond dissimilar substrates together, then the applicable substrate category with the least stringent emission limitation applies.
- h. **Housekeeping.** The following work practices for cleaning materials apply to the owner or operator of a miscellaneous industrial adhesive application processes:
1. Store all VOC-containing adhesives, adhesive primers, process-related waste materials, cleaning materials and used shop towels in closed containers.
  2. Ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials.
  3. Minimize spills of VOC-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials, cleaning up spills immediately.

4. Convey VOC-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials from one location to another in closed containers or pipes.
  5. Minimize VOC emissions from cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- i. **Measurements.** Measurements of the volatile fraction of adhesives, other than reactive adhesives, used at facilities operating miscellaneous industrial adhesive application processes shall be performed according to the applicable procedures established in § 2107.04 of this Article.



**Table 2105.85**  
**Emission Limits of VOCs for Miscellaneous Industrial Adhesives**

<b><u>Limits as Applied</u></b>	<b><u>VOC content minus exempt compounds</u></b>	
<b><u>General Adhesive Application Processes</u></b>	<b><u>lb/gal</u></b>	<b><u>g/l</u></b>
Reinforced Plastic Composite	1.7	200
Flexible Vinyl	2.1	250
Metal	0.3	30
Porous Material (Except Wood)	1.0	120
Rubber	2.1	250
Wood	0.3	30
Other Substrates	2.1	250
<b><u>Specialty Adhesive Application Processes</u></b>		
Ceramic Tile Installation	1.1	130
Contact Adhesive	2.1	250
Cove Base Installation	1.3	150
Floor Covering Installation (Indoor)	1.3	150
Floor Covering Installation (Outdoor)	2.1	250
Floor Covering Installation (Perimeter Bonded Sheet Vinyl)	5.5	660
Metal to Urethane/Rubber Molding or Casting	7.1	850
Motor Vehicle Adhesive	2.1	250
Motor Vehicle Weather-strip Adhesive	6.3	750
Multipurpose Construction	1.7	200
Plastic Solvent Welding (ABS)	3.3	400
Plastic Solvent Welding (Except ABS)	4.2	500
Sheet Rubber Lining Installation	7.1	850
Single-Ply Roof Membrane Installation/Repair (Except EPDM)	2.1	250
Structural Glazing	0.8	100
Thin Metal Laminating	6.5	780
Tire Repair	0.8	100
Waterproof Resorcinol Glue	1.4	170
<b><u>Adhesive Primer Application Processes</u></b>		
Motor Vehicle Glass Bonding Primer	7.5	900
Plastic Solvent Welding Adhesive Primer	5.4	650
Single-Ply Roof Membrane Adhesive Primer	2.1	250
Other Adhesive Primer	2.1	250

**ALL NEW TEXT**

**§ 2105.86 CONTROL OF VOC EMISSIONS FROM FIBERGLASS BOAT MANUFACTURING MATERIALS**

- a. **Applicability.** Beginning January 1, 2014, this section applies to the owner or operator of a fiberglass boat manufacturing facility, where the total actual VOC emissions from fiberglass boat manufacturing materials, including related cleaning activities, at that facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per twelve month rolling period, before controls. This regulation applies to facilities that manufacture hulls or decks of boats from fiberglass, or build molds to make fiberglass boat hulls or decks. This regulation does not apply to facilities that manufacture solely fiberglass parts of boats such as hatches, seats, lockers, or boat trailers.
- b. **Exemptions.** This regulation does not extend to surface coatings applied to fiberglass boats, and industrial adhesives used in the assembly of fiberglass boats. Surface coating for fiberglass and metal recreational boats, also called pleasure crafts, are addressed in regulation § 2105.83 CONTROL OF VOC EMISSIONS FROM MISCELLANEOUS METAL AND/OR PLASTIC PARTS SURFACE COATING PROCESSES. Industrial adhesives used in fiberglass boat assembly are addressed in regulation § 2105.85 CONTROL OF VOC EMISSIONS FROM MISCELLANEOUS INDUSTRIAL ADHESIVES.
- c. **Limitations.** A person may not cause or permit the emission into the outdoor atmosphere of VOCs from fiberglass boat manufacturing materials, unless one of the following limitations is met:
1. Fiberglass boat manufacturing facilities shall use resins and/or gel coats that are equal to or less than the applicable weighted average monomer VOC content limit specified in Table 2105.86 and the non-monomer VOC limit shall not exceed 5 percent, by weight, of resin and/or gel coat.
    - A. The weighted average monomer VOC content shall be calculated as follows:

$$\text{Weighted Average Monomer VOC Content} = \frac{\sum (M_i * \text{VOC}_i)}{\sum (M_i)}$$

Where:

$M_i$  = Mass of open molding resin or gel coat  $i$  used in the past 12 months in an operation in pounds (kg)  
 $VOC_i$  = Monomer VOC content, by weight percent, of open molding resin or gel coat  $i$  used in the past 12 months in an operation

- d. **Records.** A facility, regardless of the facility's annual emission rate, which uses fiberglass boat manufacturing materials, shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:
1. The following parameters for each material either resin and/or gel as supplied:
    - A. The name and identification number of each resin and/or gel;
    - B. The volume used;
    - C. The mass of materials used;
    - D. The monomer VOC content, by weight percent, of resin or gel coat used;
    - E. The non-monomer VOC content, by weight percent, of each resin or gel coat;

The records shall be maintained for 2 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

- e. **Cleaning Material Standards.** The VOC content of cleaning solvents employed for routine application equipment cleaning shall contain a maximum of 5 percent VOC, by weight, or have a composite partial vapor pressure of no more than 0.50 mm Hg at sixty-eight degrees Fahrenheit. Only non-VOC solvents shall be used to remove cured resin and gel coat from application equipment.
- f. **Work Practice Standards.** All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for onsite mixing of putties and polyputties, have a cover with no visible gaps in place at all times. This work practice standard does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- g. **Measurements.** Measurements of the volatile fraction of resin and gels, used at fiberglass boat manufacturing facilities shall be performed according to the applicable procedures established in § 2107.04 of this Article.

## **2. Technical Support Document**

### **Summary of Change**

The changes to the sections of Article XXI add four Control Techniques Guidelines (CTG) categories as four regulations. Definitions arising from these CTG regulations were also added to Article XXI. Changes were also made to an existing regulation, making any limits pertaining to these CTG regulations void after 1/1/2014.

**§2101.20, Definitions (SIP Change);**  
**§2105.10, Surface Coating Processes (SIP Change);**  
**§2105.83, Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes (SIP Change);**  
**§2105.84, Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings (SIP Change);**  
**§2105.85, Control of VOC Emissions from Miscellaneous Industrial Adhesives (SIP Change); and**  
**§2105.86, Control of VOC Emissions from Fiberglass Boat Manufacturing Materials (SIP Change)**

The CTG categories for Miscellaneous Metal and Plastic Parts Coatings, Automobile and Light-Duty Truck Assembly Coatings, Miscellaneous Industrial Adhesives, and Fiberglass Boat Manufacturing Materials, were issued by the EPA in 2008. The EPA has mandated that these CTGs become regulations, written by Local or State Air Pollution Control Agencies.

The regulation changes to sections **§2101.20** and **§2105.10**, and the addition of regulations **§2105.83**, **§2105.84**, **§2105.85** and **§2105.86** to Article XXI constitute a change to the Allegheny County portion of the Pennsylvania State Implementation Plan (SIP) for the control of ozone with respect to those sections.

### **3. Documentation of Public Hearing and Certifications**

Notice of Public Hearing

Transmittals of hearing notice to EPA & PA DEP

Proof of publication of notice of hearing

Certification of hearing

Summary of Comments and responses

Certification of approval and adoption

NOTICE OF PUBLIC HEARING  
FOR PROPOSED AMENDMENTS TO  
ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS  
ARTICLE XXI, AIR POLLUTION CONTROL

The Allegheny County Board of Health will hold a public hearing on **Friday, March 9, 2012**, at **10:00 AM**, Building #7 First Floor Conference Room, Clack Health Center, 301 39th Street, Pittsburgh, PA 15201 to take testimony on the following proposed modifications to Allegheny County Health Department Article XXI and County Ordinance 16782:

Revision to the following Article XXI sections as they relate to Control Techniques Guidelines:

§2101.20, Definitions;

§2105.10, Surface Coating Processes;

§2105.83, Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes;

§2105.84, Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings;

§2105.85, Control of VOC Emissions from Miscellaneous Industrial Adhesives;

§2105.86, Control of VOC Emissions from Fiberglass Boat Manufacturing Materials.

**The proposed changes to §2101.20 and §2105.10 and the additional regulations §2105.83, §2105.84, §2105.85, §2105.86 will be incorporated as a revision to Allegheny County's portion of the Pennsylvania State Implementation Plan for the control of ozone.**

Copies of the proposed amendments may be examined beginning Wednesday, February 8, 2012, at the Allegheny County Law Library, Room 921 City-County Building, Grant Street, Pittsburgh, PA 15219, from 8:30 AM to 5:00 PM; at the Allegheny County Health Department Library, Building 7, Clack Health Center, from 8:30 AM until 3:30 PM Monday thru Friday; on the Allegheny County Health Department web site: [www.achd.net](http://www.achd.net); or by calling 412-578-8120 to request a mailed printed copy.

Oral testimony must be pre-scheduled by calling 412-578-8008 no less than 24 hours in advance of the public hearing. Speakers will be limited to five minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning **Wednesday, February 8, 2012**, and concluding **Wednesday, March 14, 2012**, by mail to:

Board of Health  
3333 Forbes Avenue  
Pittsburgh, PA 15213  
By email to BOH@achd.net  
By Fax to 412-578-8325

# Allegheny County Health Department

## DIRECTOR

Bruce W. Dixon, M.D.



## AIR QUALITY PROGRAM

301 39<sup>th</sup> Street – Bldg. #7  
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115  
Fax: (412) 578-8144

## BOARD OF HEALTH

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Vice Chair

Rev. Ricky V. Burgess  
Donald S. Burke, M.D.

Joan Cleary, R.N.

Anthony Ferraro

James M. Flynn, Jr.

Ellen C. Stewart, M.D.

William Youngblood

January 10, 2012

Ms. Joyce Epps, Director  
Department of Environmental Protection  
Bureau of Air Quality  
Rachel Carson Building  
400 Market Street, P.O. Box 8468  
Harrisburg, PA 17105-8468

Dear Ms. Epps:

Enclosed is a Notice of Public Hearing scheduled to occur on March 9, 2012, regarding proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, to revise sections related to Control Techniques Guidelines. The portions of 2101.20 and 2105.10 included in the change and sections 2105.83, 2105.84, 2105.85 and 2105.86 will also be submitted as changes to Allegheny County's portion of the Pennsylvania State Implementation Plan.

The SIP revision is being tracked as our Revision Tracking Number 74.

Your comments are welcome.

Sincerely,

James Thompson, Manager  
Air Quality Program

cc: Arleen Shulman  
Steve Hepler

## Enclosures

- Notice of Public Hearing
- Proposed Article XXI Revisions/SIP Revision 74

# Allegheny County Health Department

## DIRECTOR

Bruce W. Dixon, M.D.



## AIR QUALITY PROGRAM

301 39<sup>th</sup> Street – Bldg. #7  
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115  
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## BOARD OF HEALTH

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Anthony Ferraro

James M. Flynn, Jr.

Ellen C. Stewart, M.D.

William Youngblood

January 10, 2012

Ms. Diana Esher, Director  
Air Protection Division  
Region III (3AP00)  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Ms. Esher:

Enclosed is a Notice of Public Hearing scheduled to occur on March 9, 2012, regarding proposed revisions to the Allegheny County Health Department Rules and Regulations, Article XXI, Air Pollution Control and County Ordinance Number 16782, to revise sections related to Control Techniques Guidelines. The portions of 2101.20 and 2105.10 included in the change and sections 2105.83, 2105.84, 2105.85 and 2105.86 will also be submitted as changes to Allegheny County's portion of the Pennsylvania State Implementation Plan.

The SIP revision is being tracked as our Revision Tracking Number 74.

Your comments are welcome.

Sincerely,

James Thompson, Manager  
Air Quality Program

## Enclosures

- Notice of Public Hearing
- Proposed Article XXI Revisions/SIP Revision 74



No. \_\_\_\_\_ Term, \_\_\_\_\_  
**Proof of Publication of Notice in Pittsburgh Post-Gazette**  
Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss M. Goodwin, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the \_\_\_\_\_ regular \_\_\_\_\_ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

13 of January, 2012

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the aforesaid notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

**COPY OF NOTICE OR PUBLICATION**

NOTICE OF PUBLIC HEARING FOR PROPOSED AMENDMENTS TO ALLEGHENY COUNTY HEALTH DEPARTMENT RULES AND REGULATIONS

ARTICLE XXI. AIR POLLUTION CONTROL

The Allegheny County Board of Health will hold a public hearing on Friday, March 9, 2012, at 10:00 AM, Building #7 First Floor Conference Room, Clark Health Center, 301 39th Street, Pittsburgh, PA 15201 to take testimony on the following proposed modifications to Allegheny County Health Department Article XXI and County Ordinance 14782:

Revision to the following Article XXI sections as they relate to Control Techniques Guidelines:

§2101.20, Definitions;

§2105.10, Surface Coating Processes;

§2105.53, Control of VOC Emissions from the following:

§2105.53.1, 10 minutes and should bring a written copy of their comments.

The Board will accept written testimony beginning Wednesday, February 8, 2012, and concluding Wednesday, March 14, 2012, by mail to:

Board of Health  
3333 Forbes Avenue  
Pittsburgh, PA 15213  
By email to: BOH@achd.net  
By Fax to: 412-678-8323

M. Goodwin  
PG Publishing Company  
Sworn to and subscribed before me this day of:  
January 13, 2012

Jinda M. Gaertner  
COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Jinda M. Gaertner, Notary Public  
City of Pittsburgh, Allegheny County  
My Commission Expires Jan. 31, 2015  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

**STATEMENT OF ADVERTISING COSTS**  
ALCTY HEALTH-LEGAL-FORBES AVE  
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3333 FORBES AVE  
PITTSBURGH PA 15213

To PG Publishing Company

Total \_\_\_\_\_ \$131.25

**Publisher's Receipt for Advertising Costs**

PG Publishing Company, a Corporation, Publisher of Pittsburgh Post-Gazette, a Newspaper of General Circulation, of the aforesaid advertising and publication costs and certifies that the same have

PG Publishing Company, a Corporation, Publisher of Pittsburgh Post-Gazette, a Newspaper of General Circulation

By \_\_\_\_\_

PG PUBLI  
hereby ack  
been fully  
Of  
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Phone 412  
I hereby certify

the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

cc: J. Etzel 2/9/12

Attorney For

Revision 74

SIP Submittal for Control Techniques Guidelines (CTG)

Certification of Hearing

Shaun Vozar deposes and says that he is an Air Pollution Control Engineer III of the Air Quality Program of the Allegheny County Health Department and hereby certifies that a Public Hearing was held on March 9, 2012 on the proposed amendment to the County's portion of the Pennsylvania State Implementation Plan that would add three regulations to Article XXI; the regulation revisions and SIP amendments address four CTG categories as four regulations: §2105.83 Control of VOC Emissions from Miscellaneous Metal and/or Plastic Parts Surface Coating Processes, §2105.84 Control of VOC Emissions from Automobile and Light-Duty Truck Assembly Coatings, §2105.85 Control of VOC Emissions from Miscellaneous Industrial Adhesives, and §2105.86 Control of VOC Emissions from Fiberglass Boat Manufacturing Materials; changes were made to an existing regulation, §2105.10 Surface Coating Processes, making any existing limits pertaining to these CTG regulations void after 1/1/2014; that the opportunity for written comments was given in accordance with the requirements of 40 CFR 51.102; that notice of such hearing was given by publication in a newspaper of general circulation on January 13, 2012; and to the best of his knowledge, belief and understanding, such proceedings were in full compliance with all applicable State and Federal laws, regulations, and other requirements.

Shaun Vozar

Shaun Vozar,  
Air Pollution Control Engineer III  
Air Quality Program  
Allegheny County Health Department

3/23/12

Date

**Comment and Response Document for the Proposed SIP Revision 74  
Regulation Changes for Ozone Control Techniques Guidelines  
March 9, 2012 Public Hearing**

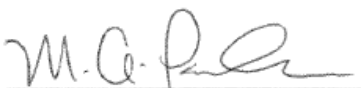
**1. Comment:**

**Commenter:** No comments were received.

**Response:**

### CERTIFICATION of APPROVAL and ADOPTION

To the best of my knowledge, information, and belief, I the undersigned hereby certify that the additions of Sections 2105.83, 2105.84, 2105.85 and 2105.86 to, and the amendments to Sections 2101.20 and 2105.10 of, Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control, and Ordinance No. 16782 of the County of Allegheny, adopted by the Allegheny County Board of Health on May 2, 2012, enacted by the Allegheny County Council on May 22, 2013 (Ordinance 16-13-OR), approved by the Allegheny County Chief Executive on May 29, 2013, and effective June 8, 2013, as a revision to the County's Portion of the Pennsylvania State Implementation Plan for the Attainment and Maintenance of the National Ambient Air Quality Standards, were duly and properly enacted as prescribed by the Local Health Administration Law and the Second Class County Charter Law, and as such, are fully and legally enforceable by the Allegheny County Health Department and the County of Allegheny as provided for by the within authority.



Michael A. Parker  
Assistant Solicitor  
Allegheny County Health Department

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF ALLEGHENY ) S.S. \_\_\_\_\_

On the 12 day of July, 2013,

Michael A. Parker personally appeared before me, the undersigned authority, satisfactorily proven to me to be the person whose name appears above, and did in my presence execute the above certification for the purposes contained therein.

WHEREFORE, I have hereunto set my hand and official seal the 12 day of July, 2013.

  
NOTARY PUBLIC