Division of Air Pollution Control

Response to Comments
Draft Rule Language Comment Period

Rule: OAC Chapter 3745-21

Agency Contact for this Package

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Ohio EPA provided a 30-day comment period which initially ended on January 8, 2010. This document summarizes the comments and questions received at the public hearing and/or during the associated comment period.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

Specific Comments

Rule 3745-21-09 "Control of Emissions of Volatile Organic Compounds from Stationary Sources."

Comment 1:

In section (C)(2) the applicability of this section is very different from the applicability in new rule OAC 3745-21-29 (A)(1). Honda believes that OAC 3745-21-09(C)(2) should be modified to make it clear that the (C)(1) limits can apply and should apply to other automobile parts coated with the body. We recommend the following change to (C)(2):

"The emission limitations specified in paragraph (C)(1) of this rule shall apply to the application of surface coatings, except sound-proofing materials, to the frame, main body, interior panels and exterior sheet metal such as the hood, trunk lid, fenders, cargo boxes, doors and grill openings of an automobile or light-duty truck **and to other parts that are coated along with these bodies or body parts.** The emission limitation specified...."
(Jeffrey Waid, Honda)

Response 1:

Ohio EPA agrees with the suggested amendment. Therefore, paragraph (C)(2) of this rule will be amended by adding the following text to the end of the first sentence in this paragraph; " … and to other parts that are coated along with these bodies or body parts."

Comment 2:

In section (C)(4) you have crossed out reference to the old "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" ~~(EPA 450/3-88-018)~~. Did Ohio EPA intend on referencing the new document as they did in OAC 3745-21-29(F)(4)? Or would it be more useful to make a statement suggesting the use of the most current approved document ?
(Jeffrey Waid, Honda)

Response 2:

Ohio EPA has deleted reference to "EPA 450/3-88-018" in this paragraph because all such references to documents are found in the last paragraph of OAC rule 3745-21-01(i.e., paragraph JJ) titled "Reference to Materials."

Rule 3745-21-23 "Industrial Cleaning Solvents."

Comment 3:

Under 3745-21-23(A)(1)(b), the proposed rule states: "The facility employs solvent materials in solvent cleaning operations during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas, and stores and/or disposes of these solvent materials."

This section should add more clarity on waste solvent that is recycled on-site or solvent that is sent off site for recycling or reclaim and returned to the facility from where it was generated. If a facility reclaims these materials they appear to be exempt from this rule.
(Mathew P. Narducci, MFG Composite Systems Company)

Response 3:

This rule regulates the “use” of industrial cleaning solvents. A facility may recycle an industrial solvent, but once it is used in a manner as specified in paragraph (A)(1)(b) of this rule, it is subject to the provisions of this rule. No changes will be made to this part of the rule.

Comment 4:

Under 3745-21-23(D), exemptions, include exemption from the requirements of this rule if cleanup solvent used is listed in 3745-21-01(B)(16), definition of non-VOC compounds.
(Mathew P. Narducci, MFG Composite Systems Company)

Response 4:

An additional exemption is not necessary. Following the regulatory definition of VOC, which includes specific VOC compounds that are excluded, is sufficient for the purpose of this rule.

Comment 5:

Under 3745-21-23(D)(1)(c), the proposed rule states: "The following solvent cleaning operations are exempt from all the requirements of this rule: (c) Stripping of cured coatings, cured ink, or cured adhesives."

We recommend that this exemption also identify cured or dried polyester resins, using similar language from 40 CFR Part 63, Subpart WWWW Composites MACT, for cleanup operations. The exemption language in WWWW reads as follows: "No use of cleaning solvents that contain HAP, except that Styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin" (Table 4 to Subpart WWWW of Part 63 - Work Practice Standards).
(Mathew P. Narducci, MFG Composite Systems Company)

Response 5:

Ohio EPA acknowledges your suggestion. However, exemptions are already provided in this rule for those facilities employing polyester resins subject to the MACT standards in Subpart VVVV and WWWW, or OAC rule 3745-21-27 (fiberglass boat manufacturing), specifically, the exemptions specified listed in paragraphs (D)(2)(o) and (D)(2)(p) of this rule.

Comment 6:

Under 3745-21-23(F)(1) Compliance Test Methods, the proposed rule states: "For any solvent cleaning operation that is subject to the requirements of paragraph (C)(1) of this rule, USEPA Method 24 shall be used to determine the VOC content of the solvent material employed in the solvent cleaning operation."

Add language that allows for use of supplier technical data sheets and/or Material Safety Data Sheets to determine VOC content of the solvent material, provided the manufacturer or supplier used Method 24 or equivalent to determine VOC content of the material.
(Mathew P. Narducci, MFG Composite Systems Company)

Response 6:

Ohio EPA agrees with your suggested change and will add clarifying language to allow for the use of formulation data from the supplier.

Rule 3745-21-24 "Flat Wood Paneling Coatings."

Comment 7:

3745-21-09 (B)(3)(a) should reference 3745-21-24 to close the loop in order to make (B)(3) applicable.
(Steve Rosenthal, U.S. EPA)

Response 7:

The Ohio EPA agrees. Paragraph (B)(3)(a) of rule 3745-21-09 of the Administrative Code will be revised accordingly.

Rule 3745-21-26 "Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings."

This rule is no longer a part of this package. Ohio EPA is taking additional time to review comments and perform a needed analysis to develop this rule. This rule will proceed under a separate comment period and public notice in the near future. A separate Response to Comments document will address comments received relevant to this rule.

Rule 3745-21-27 "Control Techniques Guidelines Fiberglass Boat Manufacturing."

Comment 17:

General comments - include and refer to Equation Nos.
(Steve Rosenthal, U.S. EPA)

Response 17:

Formatting guidelines and procedures for Ohio rules as specified by the Legislative Service Commission (LSC) establish that Ohio EPA cannot number equations in our rules. The rules do reference appropriate equations by paragraph as needed. No amendments will be made to this part of the rule.

Comment 18:

(D)(3)(a) - change "molding operations" to "open molding resin and gel coat operations" **(Steve Rosenthal, U.S. EPA)**

Response 18:

The Ohio EPA agrees. The text in this paragraph will be amended accordingly.

Comment 19:

Monomer VOC limit - change to "total allowable monomer VOC that can be emitted from the molding operations included in the average, pounds per 12-month period." **(Steve Rosenthal, U.S. EPA)**

Response 19:

The Ohio EPA agrees. The text in this paragraph will be amended accordingly.

Comment 20:

Paragraph (F): (B)(1)(a) and (B)(1)(c) should be (B)(1) and (B)(3).
(Steve Rosenthal, U.S. EPA)

Response 20:

The Ohio EPA agrees. The paragraph references will be amended accordingly.

Comment 21:

(H)(2)(a)(ii) - add April, 1996 to SCAQMD Method 312-91.

(Steve Rosenthal, U.S. EPA)

Response 21:

The Ohio EPA agrees. The SCAQMD Method 312-91 referenced in this paragraph will be updated accordingly in the “Referenced Materials” section of OAC rule 3745-21-01.

Comment 22:

(H)(2)(a)(iv) - revise the last paragraph to "If the weighted-average VOC content for all materials of a certain type and a specific application method does not exceed ..." **(Steve Rosenthal, U.S. EPA)**

Response 22:

The Ohio EPA agrees. Specifically, the amendment concerns (H)(2)(a)(v). The suggested amendment will be made.

Comment 23:

(I)(1)(a) - change to "The total amounts, in pounds, of atomized molding production resin, nonatomized production resin, pigmented gel coat, clear gel coat, atomized tooling resin, nonatomized tooling resin and tooling gel coat used per month and the weighted-average VOC contents for each operation, expressed as weight percent."
(Steve Rosenthal, U.S. EPA)

Response 23:

The Ohio EPA agrees. The text in this paragraph will be amended accordingly.

Comment 24:

(M)(2) - (B)(1)(a), (B)(1)(b) and (B)((1)(c) should be (B)(1), (B)(2) and (B)(3).
(Steve Rosenthal, U.S. EPA)

Response 24:

The Ohio EPA agrees. The paragraph references will be amended accordingly.

Rule 3745-21-28 "Control Techniques Guidelines for Miscellaneous Industrial Adhesives."

Comment 25:

In OAC 3745-21-28 (C)(1) Table 1 has a listed limit for "Automotive Glass Adhesive Primer" of 5.9 lb VOC/gal while the USEPA CTG for "Motor Vehicle Glass Bonding Primer" has a listed limit of 7.5 lb VOC/gal. Due to the extreme importance of this application in creating a quality window seal we request that the USEPA CTG limit be used in place of the proposed OAC limit. **(Jeffrey Waid, Honda)**

Response 25:

The above-mentioned limit of 5.9 lb VOC/gal for "Automotive Glass Adhesive Primer" was taken from the Ozone Transport Commission (OTC) model rule which Ohio used as background for preparing our initial draft rule. A review of the limits in Table 1 of Ohio's rule indicates that automotive glass is the only category that does not match its CTG counterpart. Therefore, Ohio EPA will modify the category limit to 7.5 lb VOC/gal to match the CTG limit and create uniformity between Ohio's Table and federal requirements.

Comment 26:

(A)(2)(d) - It is not appropriate to exempt adhesives, etc., subject to 3745-112 because 3745-112 does not cover manufacturing operations and the limits in 3745-21-28 have been determined to constitute RACT for this source category. **(Steve Rosenthal, U.S. EPA)**

Response 26:

Ohio EPA agrees with the commenter. This exemption will be modified to be consistent with the exemption as it was written on page 16 of the USEPA CTG.

Comment 27:

(C)(1)(c) - The last sentence should be revised to "similar transfer efficiencies to HVLP" **(Steve Rosenthal, U.S. EPA)**

Response 27:

Ohio EPA agrees with the commenter. The suggested amendment will be made.

Comment 28:

(C)(3) - please make consistent with the work practices in CTG.
(Steve Rosenthal, U.S. EPA)

Response 28:

Ohio EPA agrees with the commenter. The suggested amendment will be made.

Comment 29:

(D)(2) - please revise the first sentence to "Any owner or operator of a miscellaneous industrial adhesive and sealant application process who complies with paragraph (C)(2) in lieu of (C)(1) of this rule..."
(Steve Rosenthal, U.S. EPA)

Response 29:

Ohio EPA agrees with the commenter. The suggested amendment will be made.

Comment 30:

(E)(1) - I believe that this should be "Except as provided in paragraphs (E)(3) to (E)(4) of this rule..."
(Steve Rosenthal, U.S. EPA)

Response 30:

Ohio EPA agrees with the commenter. The suggested amendment will be made.

Comment 31:

(H)(1)(a)(ii) and (b)(ii) - lbs VOC per gallon is needed, in addition to percent by weight, if gallons are reported in (H)(1)(a)(i) and (b)(i).
(Steve Rosenthal, U.S. EPA)

Response 31:

Ohio EPA agrees with the commenter. The suggested amendment will be made.

Rule 3745-21-29 "Control Techniques Guidelines for Automobiles and Light-Duty truck Assembly Coatings."

Comment 32:

In OAC 3745-21-29 (F)(4) it states that the Protocol is to be used for compliance; however, in OAC 3745-21-29 (F)(7) it requires compliance testing and monitoring in accordance with the requirements referenced in 21-15 and 21-10. While the Protocol and the Auto MACT clearly allow the company to test capture efficiency by a panel test OR Method 204, the language in OAC 3745-21-29 (F)(7) seems to prohibit the use of a panel test for compliance. Is it Ohio EPA's intent to only allow the use of Method 204 for capture efficiency testing or would the use of a panel test still be permissible? Could the language in this section be more clear about what testing is allowed under this section? **(Jeffrey Waid, Honda)**

Response 32:

The panel test found in the protocol document can be used to determine the capture efficiency. Therefore, the proposed wording has been added to allow for the testing provided in the protocol document.

Comment 33:

OAC 3745-21-29 (F)(7) references monitoring requirements and the establishment of operating parameters by following the requirements of OAC 3745-21-15 (H) and (J)(2). While we recognize that these requirements are similar to the requirements of the Auto MACT, they are not the same and are in some cases more stringent than the requirements of 40 CFR 63.3165, 63.3167 and 63.3168. Most notably, in OAC 3745-21-15 (J)(2)(e) it sets forth requirements for enclosures that are not found in the Auto MACT. In addition, 40 CFR 63.3165 of the Auto MACT clearly states what constitutes a "natural draft opening". Such clarifying language is not found in the definition of "natural draft opening" for OAC 3745-21-15. Finally, it would make compliance with these requirements much easier to accomplish for the regulated community if they matched requirements that were already in place, rather than asking the Auto industry to comply with a set of requirements originally established for the Wood Furniture Manufacturing Industry. We request that OAC 3745-21-29 (F)(7) reference the monitoring and establishment of operating parameters in the Auto MACT rather than the requirements of OAC 3745-21-15. **(Jeffrey Waid, Honda)**

Response 33:

The Ohio EPA agrees with the commenter that the Auto MACT would be more appropriate for monitoring requirements and the related establishment of operating parameters. Therefore, the reference to OAC rule 3745-21-09(J)(2)

has been deleted and replaced with a reference to the Auto MACT, namely subpart IIII of 40 CFR part 63.

Comment 34:

Ford Motor Company (Ford) appreciates the opportunity to provide comments on the draft regulatory language prepared by Ohio EPA for new and amended rules in Chapter 3745-21 of the Ohio Administrative Code (OAC) as referenced in the December 9, 2009 e-mail from Robert Hodanbosi. Ford supports the adoption of the recommended limits and work practices incorporated into the Control Techniques Guidelines (September 2008) as identified in the Federal Register. The proposed new rules under OAC 3745-21-29 (Control of volatile organic compound emissions from automobile and light-duty truck assembly coating operations, heavier vehicle assembly coating operations, and associated facility coating operations) are consistent with the recommended limits generally with perhaps a few exceptions and should replace the previous limits based on the 1977 CTG promulgated at OAC 3745-21-09(C). The comments offered below are intended to help clarify the proposed rules. Following the comment, the proposed rule language is excerpted and marked up with suggested changes to be more consistent with the "Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings", PA-453/R-08-006, September 2008[2] , hereinafter called the 2008 Auto CTG, and the Auto Protocol and more flexible with the Title V permitting program.

The definitions pertaining to OAC 3745-21-29 are incorporated into OAC 3745-21-01(D) together with the definitions pertaining to several other rules including OAC 3745-21-26 covering miscellaneous metal and plastics parts coating operations. Given the similar terms used in the different rules, one will have to be very careful not to use the wrong term or definition, otherwise conflicts could arise. For example, "Final Repair" is different from "Repair Coating." It may be better to amend OAC 3745-21-01(D) to separate the definitions for the different rules in which they are used. **(Duane Johnson, Ford Motor Company)**

Response 34:

The term “final repair” is used under both OAC rule 3745-21-09(C) and OAC rule 3745-21-29. In order to avoid ambiguity with other terms that pertain to a repair coating, references to the appropriate rule will be inserted into any defined term that pertains to a repair coating.

Comment 35:

OAC 3745-21-29 is more stringent than its predecessor (OAC-3745-21-09(C)) and it should include a provision to avoid improperly applying both rules to the same source. In addition, some of the new material VOC limits replace those

limits that were only contained in OAC 3745-21-09(U) such as windshield primer materials. Therefore, paragraph (A) should be revised to clarify that OAC 3745-21-09(C) does not apply to facilities subject to OAC 3745-21-29.

(A) Applicability.

(1) Except as otherwise provided in paragraph (A)(3) of this rule, the requirements of paragraphs (B) to (I) this rule shall apply to the following operations at an automobile and light-duty truck assembly facility, a facility that performs these operations on a contractual basis, or a heavier vehicle assembly facility that meets the criteria under paragraph (A)(2) of this rule **in lieu of OAC 3745-21-09(C) or OAC 3745-21-09(U):**

(a) All primary coatings applied to:

(i) New automobile or new light-duty truck bodies;

(ii) Body parts for new automobiles or new light-duty trucks; and

(iii) Other parts that are coated along with these bodies or body parts.

(b) Additional coatings applied during the vehicle assembly process. Additional coatings include glass bonding primer, adhesives, cavity wax, sealer, deadener, gasket/gasket sealing material, underbody coating, trunk interior coating, bedliner, weatherstrip adhesive and lubricating waxes/compounds; and

(c) The coating of bodies and/or body parts for new heavier vehicles at an automobile and light-duty truck assembly facility or a heavier vehicle assembly facility that meet the applicability requirements of rule 3745-21-26 of the Administrative Code; however, the owner or operator elects to comply with the requirements of this rule in lieu of the requirements of rule 3745-21-26 of the Administrative Code. **(Duane Johnson, Ford Motor Company)**

Response 35:

The commenter makes a good point about transferring the applicability of VOC limits to a coating operation from one rule to another. Please note that the introduction to paragraph (C) of OAC rule 3745-21-09 contains the following new wording:

“For any source located in Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage or Summit County subject to paragraph (C) of this rule, the requirement to comply with paragraph (C) of this rule shall terminate at such time the source becomes subject to and complies with rule 3745-21-29 of the Administrative Code.”

Also, the introduction to paragraph (U) of OAC rule 3745-21-09 contains the following new wording:

“For any source located in Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage or Summit County subject to paragraph (U) of this rule, the requirement to comply with paragraph (U) of this rule shall terminate at such time the source becomes subject to and complies with rule 3745-21-26 of the Administrative Code.”

The above two newly worded paragraphs should be adequate for identifying the proper application of paragraphs (C) and (U) to operations that are subject to OAC rule 3745-21-26 or OAC rule 3745-21-29.

Comments 36:

Paragraph (E) should be clarified consistent with the "comment" listed immediately under it to specifically state that it is an alternative to the separate limits imposed under Paragraphs (C) and (D).

(C)(1)(e) ~~For~~ **As an alternative to the separate limits listed in paragraphs (C) and (D) of this rule, for** combined primer-surfacer and topcoat coating operations, 12.0 pounds of VOC per gallon of deposited solids.

[Comment: This is an alternative emission limitation in place of the emission limitations separately applicable to primer-surfacer coating operations and topcoat coating operations at the facility.]
(Duane Johnson, Ford Motor Company)

Response 36:

The Ohio EPA agrees that paragraph (C)(1)(e) can be better clarified as an alternative to the separate limits under paragraphs (C)(1)(c) and (C)(1)(d). However, Ohio EPA feels the comment stands on its own and doesn’t necessitate duplicate wording similar to that suggested by the commenter. Clarifying language will be added.

Comment 37:

Paragraph (F)(1) should be clarified to indicate that coating manufacturer's formulation data may be used to establish the coating VOC content consistent with the 2008 Auto CTG.
(F) Compliance procedures and test methods.

(1) The VOC content of a coating, other than a reactive adhesive, shall be determined by the owner or operator in accordance with paragraph (B) of rule 3745-21-10 of the Administrative Code, wherein **coating manufacturer's** formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.
(Duane Johnson, Ford Motor Company)

Response 37:

Paragraph (B)(4) of OAC rule 3745-21-10 refers to “coating formulation data from the coating manufacturer and coating user.” As such, the coating manufacturer’s formulation data may be used. The recommended clarification is not needed.

Comment 38:

Paragraph (F)(2) should be clarified to indicate that this paragraph pertains to reactive adhesives (and not necessarily reactive "diluents") because diluents may not be added to the reactive adhesives; rather it may simply be the materials themselves that are reactive.

(2) VOC content of a reactive adhesive.

For **reactive** adhesives ~~that contain reactive diluents~~, the VOC content of the adhesive is determined after **the adhesive material finishes** curing. The pounds of VOC per gallon of adhesive, less water and exempt compounds, shall be calculated according to the following equation:
(Duane Johnson, Ford Motor Company)

Response 38:

The Ohio EPA agrees with the commenter that this paragraph pertains to reactive adhesives and not necessarily reactive diluents. As such, the wording ”that contain reactive diluents” has been deleted for the proposed rule.

Comment 39:

Paragraphs (F)(3) and (F)(4) pertain to electrostatic dip coating (EDP or E-Coat) operations. The averaging time for such operations is on a calendar month basis like that in the Auto NSPS as explained in the 2008 Auto CTG. It is not based on a 30-day rolling average. The current tools used to demonstrate compliance throughout the country with these limits are based on collecting daily pours during a calendar month and reporting the results on a monthly average. Please note that it has been exceptionally rare in our experience that an adjustment to

the emission limit was needed to account for a very low solids turnover ratio, such an adjustment is appropriate when there is very little to no production. However, computing the solids turnover ratio should only be required when an adjustment of the emission is made; otherwise no computation should be made.

(3) VOC content of a coating applied by a dip coater (~~rolling thirty-day~~ **calendar month** average VOC content).

The as applied VOC content of a coating applied by a dip coater shall be determined by the owner or operator as a ~~rolling thirty-day~~ **calendar month** average of the VOC content of the material (coating and thinner) added to the reservoir of the dip coater. The ~~rolling thirty-day~~ **calendar month** average VOC content (C30), expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, shall be calculated for each **month** ~~day~~ of operation of the dip coater as follows:

Where:

Ai,30 = amount of material i added to the reservoir of the dip coater during a ~~thirty-day~~ **calendar month** period ~~consisting of the day of operation of the dip coater plus the previous twenty-nine calendar days~~, expressed in gallons.

Ci,VOC = VOC content of material i expressed in pounds of VOC per gallon.

Vi,solids = volume fraction of solids (nonvolatile matter) in material i.

Vi,VOC = volume fraction of VOC in material i.

i = subscript denoting a specific material (coating or thinner) added to the reservoir of the dip coater during the ~~thirty-day period~~ **calendar month**.

n = total number of materials (coatings and thinners) added to the reservoir of the dip coater during the ~~thirty-day period~~ **calendar month**.

(4) Compliance with the limitations specified in paragraphs (C)(1)(c), (C)(1)(d), and (C)(1)(e) of this rule shall be determined each day of operation in accordance with the publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations" (EPA-453/R-08-002). Compliance with the limitation specified in paragraph (C)(1)(a) of this rule shall be determined each ~~day~~ **calendar month** of operation and is based upon a weighted average by volume of all coating materials employed in the coating operation in the ~~past thirty days~~ **calendar month**. Compliance with the limitation specified in paragraphs (C)(1)(b) and (C)(1)(f) of this rule is based upon a weighted average by volume of all coating materials employed in the coating operation in any one day. **(Duane Johnson, Ford Motor Company)**

Response 39:

The commenter is correct that the averaging time for electrostatic dip coating under the Auto NSPS is monthly. Also, under paragraph (C)(2)(a) of OAC rule 3745-21-29, the solids turnover ratio, which determines the applicable limit, is a monthly value. As such, the determination of compliance for the electrostatic dip primer coating is a monthly determination. However, for any other dip coating, the determination of compliance is a daily determination based upon coating materials added to the dip tank during the past 30 days. RACT limits for VOC are generally enforced on a daily basis due to the National Ambient Air Quality Standard for ozone being a daily-determined value. In order to avoid ambiguity regarding the electrostatic dip primer coating and other types of dip coating, a clarifying statement has been added to paragraph (F)(3). Also, paragraph (F)(4) pertains to topcoat and primer surface coatings that are regulated on a daily basis. The daily determination of compliance is established within the protocol document, wherein monthly coating usage is prorated to a day based upon the type of vehicle coated and the type/color of vehicle coating.

Comment 40:

Paragraph (F)(7), describing the required monitoring requirements for add-on control equipment when used to meet the emission limits per Paragraph (D), should refer to the Auto Protocol and not OAC 3745-21-15. The Auto Protocol explains how add-on controls should be monitored and how capture efficiency tests should be performed and provides a more appropriate reference.

(7) Add-on pollution control equipment.

For add-on air pollution control equipment employed in accordance with paragraph (D) of this rule, the owner or operator shall:

(a) Meet the same monitoring requirements as contained **in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations" (EPA-453/R-08-002).** ~~paragraph (H) of rule 3745-21-15 of the Administrative Code~~; and

(b) Conduct a compliance test to determine the capture efficiency of a capture system, the control efficiency of a control device (or each control device if a combination of control devices is employed), and the overall control efficiency of the add-on air pollution control equipment in accordance with paragraph (C) of rule 3745-21-10 of the Administrative Code wherein USEPA Method 25 or 25A shall be used for determining the concentration of VOC in a gas stream. During the compliance test, the owner or operator shall establish the operating limits (operating parameter values) for the required monitoring devices by following the

requirements contained in **the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations" (EPA-453/R-08-002).**
(Duane Johnson, Ford Motor Company)

Response 40:

Ohio EPA agrees with the commenter, and changes will be made to reference the monitoring and testing specified in the protocol document.

Comment 41:

Paragraph (G) should be revised to be consistent with the comments raised above.

(G) Recordkeeping and reporting.

(1) The following types of records are to be maintained by the owner or operator of a facility subject to this rule:

(a) Compliance demonstration records for coating operations.

(b) Compliance demonstration records for coating-related activities and cleaning materials.

(c) Monitoring records for add-on air pollution control systems **subject to the add-on pollution control equipment requirements of paragraph (D)**.

(2) For any coating operation subject to paragraph (C) of this rule, the owner or operator shall maintain the following records:

(a) For each coating in use at the facility:

(i) The name and VOC content as received and as applied.

(ii) The type of coating, as identified under paragraph (C) of this rule.

(b) All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(c) The amount (gallons) of each coating used each month at the facility.

(d) For each EDP primer coating operation, calculate the turnover ratio (RT) **when used to adjust the EDP emission limit as described in paragraph**

(C)(1)(a)(ii) or (iii), by the following equation:

Then calculate or select the appropriate limit according to paragraph (C)(1)(a) of this rule.

(e) For any coating operation subject to the add-on pollution control equipment requirements of paragraph (D) of this rule:

(i) Identification of the coating line or coating operation.

(ii) Documentation on the overall control efficiency of each individual add-on pollution control equipment and the overall control efficiency of the add-on pollution control system, including design estimates and the results of compliance tests conducted pursuant to paragraph (F)(7) of this rule.

(iii) For any coating that is controlled by add-on pollution control equipment, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.

(f) Records pertaining to a ~~rolling thirty-day~~ **calendar month** average VOC content for a dip coater:

(i) For each day of operation, the gallons of each material (coating and thinner) added to the dip coater reservoir.

(ii) The VOC content (in pounds of VOC per gallon), volume fraction VOC, and volume fraction solids for each material added to the dip coater reservoir.

(iii) For each **calendar month** ~~day~~ of operation, the ~~rolling thirty-day~~ average VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvent, as applied~~, as determined in accordance with paragraph (F)(3) of this rule~~.
(Duane Johnson, Ford Motor Company)

Response 41:

The Ohio EPA agrees with the additional wording suggested by the commenter for paragraphs (G)(1)(c) and (G)(2)(d) and changes will be made to the proposed rule accordingly. However, the suggested wording changes pertaining to paragraphs (D)(2)(f) and (D)(2)(f)(iii) will not be made due to the daily determination of compliance for dip coating, other than the electrostatic dip primer.

Comment 42:

Paragraphs (H) and (I) describe the compliance dates and testing requirements. It is believed that existing facilities will likely be able to demonstrate compliance based on historical testing and current data and are already subject to Title V permitting and certification requirements. Typically, a 180-day period is provided for new or modified sources that become subject to the testing/compliance demonstration requirements. Therefore, the 90-day period should be changed to a 180-day period and additional Agency discretion should be provided. In addition, compliance certifications and testing requirements should be aligned with existing Title V permits wherever possible.

(H) Compliance dates.

(1) The owner or operator of a coating operation that is subject to this rule shall comply with the requirements of this rule no later than the following dates:

(a) For any subject coating operation for which installation commenced before the effective date of this rule, the compliance date for the coating operation is either twelve months after the effective date of this rule or the date of initial startup of the coating operation, whichever is later.

(b) For any subject coating operation for which installation commenced on or after the effective date of this rule, the compliance date for the coating operation is the initial startup date of the coating operation.

(2) The owner or operator of a coating operation that is subject to this rule shall demonstrate compliance with paragraph (G)(2)(e) of this rule by testing the control device on each subject source in accordance with paragraph (G)(2)(e) of this rule according to the following:

(a) For any owner or operator of a coating operation subject to paragraph (H)(1)(a) of this rule, by no later than ~~ninety~~ **one hundred eighty** days after the process's compliance date. ~~In addition, the Ohio environmental protection agency may accept the results of an emission test conducted prior to the effective date of this rule, if the owner or operator provides information and data to the Ohio environmental protection agency which demonstrate that the test was witnessed by the Ohio environmental protection agency or its delegated agent, that an approved USEPA emission test method was employed, and that the operation of the process was consistent with the current operating conditions and operating capacity.~~

(b) For any owner or operator of a coating operation subject to paragraph (H)(1)(b) of this rule, within one hundred eighty days after the coating operation's compliance date.

(c) The Ohio environmental protection agency may accept the results of emission testing conducted prior to the effective date of this rule, if the owner or operator provides information and data to the Ohio environmental protection agency which demonstrate that the test was witnessed by the Ohio environmental protection agency or its delegated agent, that an approved USEPA emission test method was employed, and that the operation of the process was consistent with the current operating conditions and operating capacity. In addition, the Ohio environmental protection agency may accept a compliance demonstration provided by the owner or operator consistent with the source's existing Title V operating permit.

(3) Additional testing of a subject coating operation and its VOC add-on air pollution control equipment in accordance with paragraph (G)(2)(e) of this rule may be required by the director to ensure continued compliance.

(I) Requirements on applicability notification, compliance certification and permit requirements.

(1) The owner or operator of a coating operation that is subject to this rule with an initial startup date before the effective date of this rule shall notify the Ohio environmental protection agency district office or local air agency in writing that the coating operation is subject to this rule. The notification, which shall be submitted not later than sixty days after the effective date of this rule (or within sixty days after the coating operation becomes subject to this rule), shall provide the following information:

(a) Name and address of the owner or operator;

(b) Address (i.e., physical location) of the facility;

(c) Equipment description and Ohio EPA application number (if assigned) of the subject process;

(d) Identification of the VOC emission requirement, the means of compliance, and the compliance date for the subject process;

(e) Submission of an application for an operating permit or an application for a modification to an operating permit in accordance with Chapter 3745-77 of the Administrative Code (for sources subject to the Title V permit program) or in accordance with Chapter 3745-31 of the Administrative Code (for sources not subject to the Title V permit program) for each subject process:

(i) That does not possess an effective operating permit, or

(ii) That does possess an effective operating permit and the owner or operate

cannot certify in writing to the director that such subject process is in compliance with all requirements of this rule. An application for an operating permit is not required provided the subject process is operating under an effective permit and certifies compliance.

Such certification shall include all compliance certification requirements under paragraph (I)(3) of this rule. **As an alternative, the compliance certification may be made as part of the current Title V compliance certification requirements**.
(Duane Johnson, Ford Motor Company)

Response 42:

For compliance testing of add-on control equipment for a coating operation having a compliance date under paragraph (H)(1)(a) of OAC rule 3745-21-29, the compliance testing deadline specified under paragraph (H)(2)(a) has been changed to 180 days from 90 days. This would be consistent with the 180-day deadline for compliance testing under paragraph (H)(2)(b). The commenter's suggestion for moving the second sentence of paragraph (H)(2)(a) to a new paragraph (H)(2)(c) has been made. However, the commenter's additional wording pertaining to Ohio EPA accepting a compliance demonstration consistent with a source's Title V permit was determined to not be necessary and as such was not inserted. Also, the commenter's additional wording suggested for paragraph (I)(1)(e)(ii) pertaining to a compliance certification as part of a Title V permit was determined to not be needed.

Comment 43:

Please provide the basis for (F)(2) and (F)(3).
(Steve Rosenthal, U.S. EPA)

Response 43:

Paragraph (F)(2) specifies the procedure for determining the VOC content of a reactive adhesive, that is an adhesive in which volatile monomer reacts during the adhesive's curing operation. The draft wording was based upon a SCAQMD rule. The wording of this paragraph has been revised to specify the analytical test procedure in appendix A to subpart PPPP of 40 CFR part 63, which is based upon the industrial adhesives CTG.

Paragraph (F)(3) provides the determination of a rolling 30-day average VOC content for a dip coating operation. The draft wording and equation were based upon rules found in the Indiana and Pennsylvania SIPs that allow a rolling 30-day average, instead of a daily average, for a dip coating operation due to practical difficulties of allocating the intermittent addition of VOC to a specific day because such VOC is not directly applied to a part, as in a spray coating operation. The wording of this paragraph has been revised to provide a determination of a rolling 30-day average VOC content for a dip coater that is not an EDP primer coating operation and the determination of a monthly average VOC content for a dip coater that is an EDP primer coating operation. Because the VOC emission limit for an EDP primer is expressed in pounds VOC per gallon of solids, the equation for the determination of a monthly average VOC content is based upon the monthly summation of all VOC added to the EDP primer tank divided by the monthly summation of all solids added to the EDP primer tank. Because the VOC emission limit for a dip coater that is not an EDP primer coating operation is expressed in pounds VOC per gallon of coating, excluding water and exempt solvents, the equation for the determination of a rolling 30-day average VOC content is based upon the rolling 30-day summation of all VOC added to the dip tank divided by the rolling 30-day summation of all solids and VOC added to the dip tank.

Comment 44:

(G)(2) - compliance with (C)(1)(b) and (C)(1)(f) is based on a daily weighted average. Therefore, the daily volume of non-EDP primer and final repair coating use is required. **(Steve Rosenthal, U.S. EPA)**

Response 44:

Paragraph (G)(2)(h) has been added to this rule to specify the daily records associated with a daily weighted average for a coating operation subject to paragraph (C)(1)(b) or paragraph (C)(1)(f). Such records are similar to the records specified under OAC rule 3745-21-09(B)(3)(h).

Comment 45:

(J)(1) - The quantity of cleaning solvent used must also be considered.
(Steve Rosenthal, U.S. EPA)

Response 45:

The quantity, VOC content, and VOC emissions for cleaning solvents have been added under paragraph (J)(1)(a).

End of Response to Comments