

# RCSA Section 22a-174-20 CTG Adoptions & Other Amendments

SIPRAC  
August 14, 2008

# CTG Background

- ▶ Control Emissions of VOCs
- ▶ Federal Mandates
- ▶ EPA Control Measures Guidance Documents Issued 2006/2007
  - Industrial cleaning solvents
  - Offset lithographic printing and letterpress printing
  - Flexible package printing
  - Flat wood paneling coatings (none in CT)
  - Paper, film and foil coating
  - Large appliance coating
  - Metal furniture coating
- ▶ RACT
- ▶ Apply Regardless of Permit

# Common Elements

- ▶ **Applicability**
  - > 15 lb VOC/day actual emissions
  - Prior to controls
  - All like sources on premises
  - Once in always in
- ▶ **Compliance Date – January 1, 2010**
- ▶ **Exemptions and Exceptions**
- ▶ **Work Practices**
- ▶ **Records**

# General Solvent Cleaning

## (Industrial Cleaning Solvents)

- ▶ RCOSA Section 22a-174-20(ii)
- ▶ New
- ▶ Control of Emissions Applies to All
  - VOC content limits
  - Vapor pressure limits
  - >85% overall control efficiency
- ▶ 1 gal/wk Non-Compliant Solvent

# Offset Lithographic Printing and Letterpress Printing

- ▶ RCOSA Section 22a-174-20(gg)
- ▶ New
- ▶ Fountain Solutions (>1 gallon)
  - Alcohol content limits
- ▶ Printing Unit with Potential VOC Emissions >25 TPY
  - > 90/95% overall control efficiency
  - < 20 ppm
- ▶ Cleaning Solvents
  - Vapor pressure or VOC content limits
  - 110 gal/yr non-compliant solvent

# Flexible Package Printing

- ▶ RCOSA Section 22a-174-20(ff)
- ▶ New
- ▶ Work Practices
- ▶ Printing Unit with Potential VOC Emissions >25 TPY
  - VOC content limits (allows averaging on unit)
  - > 65-80% overall control efficiency

# Paper, Film and Foil Coating

- ▶ RCSCA Section 22a-174-20(q)
- ▶ Amendment
- ▶ VOC Content Limits
- ▶ Printing Unit with Potential VOC Emissions >25 TPY
  - VOC content limits (allows averaging on unit)
  - > 90% overall control efficiency
  - Equivalent

# Large Appliance Coating Metal Furniture Coating

- ▶ RCOSA Section 22a-174-20(hh) (new)
- ▶ RCOSA Section 22a-174-20(p) (amendment)
- ▶ Specifies Application Methods or HVLP Equivalent
- ▶ Compliance Options Apply to All
  - VOC content limits
  - >90% overall control efficiency
  - Equivalent

# Work Practices

- ▶ Storage
- ▶ Spills and Leaks
- ▶ Absorbent Applicators
- ▶ Conveyance
- ▶ Cleaning

# Records

- ▶ Coating/Solvent Usage
- ▶ Level of Control Documentation
- ▶ Transfer Efficiency Documentation
- ▶ Material Safety Data Sheets
- ▶ Non-Compliant Solvent Usage

# DEP Initiated Amendments

- ▶ Spray Application Equipment Cleaning
- ▶ Architectural Coatings
- ▶ Metal Cleaning
- ▶ Regulation Clean Up

# Spray Application Equipment Cleaning

- ▶ RCOSA Section 22a-174-20(jj)
- ▶ New
- ▶ No Applicability Threshold – Applies to All
- ▶ Enclosed Gun Cleaner
  - Operating requirements
- ▶ Manual Cleaning
  - VOC content limits
  - Operating requirements
- ▶ > 85% Overall Control Efficiency
- ▶ Compliance Date – January 1, 2010
- ▶ Exemptions/Exceptions/Work Practices/Records

# Architectural Coatings

- ▶ RCOSA Section 22a-174-41, Architectural and industrial maintenance coatings, July 2007
- ▶ Photochemically Reactive Solvents References Deleted
  - RCOSA section 22a-174-20(f)(2)
  - RCOSA section 22a-174-20(f)(13)
  - RCOSA section 22a-174-20(g), (h), (i)

# Regulation Clean Up

- ▶ Add References to New CTGs
  - RCOSA section 22a-174-20(f)(9)
  - RCOSA section 22a-174-20(h)(1), (2)
  - RCOSA section 22a-174-20(s)(2)(B)
  - RCOSA section 22a-174-32(b)(3)
- ▶ VOC RACT – RCOSA Section 22a-174-20(ee) – Deleted

# Status and Next Steps

- ▶ Preliminary Stages
- ▶ SIPRAC Feedback
- ▶ Regulatory Process Goals
  - To Governor's Office September
  - Public hearing December 2008
- ▶ SIP Revision

# Useful Links

- ▶ EPA Control Measures Guidance Documents  
[http://www.epa.gov/ttn/naaqs/ozone/ctg\\_act/index.htm](http://www.epa.gov/ttn/naaqs/ozone/ctg_act/index.htm)
- ▶ DEP Air Regulatory Actions In Preliminary Development  
[http://www.ct.gov/dep/cwp/view.asp?a=2684&Q=413506&depNav\\_GID=1619](http://www.ct.gov/dep/cwp/view.asp?a=2684&Q=413506&depNav_GID=1619)
- ▶ SIPRAC  
<http://www.ct.gov/dep/cwp/view.asp?a=2684&pm=1&Q=401752>

# Feedback

- ▶ Please submit written comments by August 22, 2008 to:  
Susan Amarello  
CT DEP  
Bureau of Air Management  
79 Elm Street  
Hartford, CT 06106-5127  
[susan.amarello@ct.gov](mailto:susan.amarello@ct.gov)
- ▶ Questions? Please call Susan Amarello at:  
(860) 424-3442