March 07, 2016

Transmittal of EPA Rule Review Comments

To: Kevin Williams, Sacramento Metropolitan Air Quality Management District
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    Carol Sutkus, California Air Resources Board
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From: Andrew Steckel, Rulemaking Office Chief
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We are providing comments based on our preliminary review of the draft rule identified above. Please direct any questions about our comments to me at (415) 947-4115 or to James Shears at (213) 244-1810.

Section 303.1a., Dryers or Production Equipment Exhaust Systems at Pharmaceutical and Cosmetic Manufacturing Plants, provides for a VOC capture and control system that has a combined system efficiency of at least 85% by weight, and a control efficiency of at least 90% by weight, to be used prior to 18 months after date of adoption. Section 303.1c. requires a combined efficiency of 90% effective 18 months after date of adoption. The previous SIP-approved Rule 455, Pharmaceuticals Manufacturing (50 FR 3338, 1/24/85), Section 310.1, requires the reduction of the emission of organic materials by at least 90% by weight. To avoid a rule relaxation, and to be consistent with other air district RACT rules (e.g., SCAQMD Rule 1103(d)(1)), we recommend removing the 18 month allowance and instead requiring 90% combined capture and control system efficiency to be effective immediately.

Section 306.2a., Liquid Transfer, provides for a VOC capture and control system that has a combined system efficiency of at least 85% by weight, and a control efficiency of at least 90% by weight, to be used prior to 18 months after date of adoption. Section 306.2b. requires a combined efficiency of 90% effective 18 months after date of adoption. The SIP-approved Rule 455, Section 310.3, requires that VOC emissions during transfer be reduced by 90% by weight. To avoid a rule relaxation, and to be consistent with other air district RACT rules (e.g., SCAQMD Rule 1103(d)(3)), we recommend removing the 18 month allowance and instead requiring 90% combined capture and control system efficiency to be effective immediately.
April 04, 2016

Transmittal of EPA Rule Review Comments

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Based on our preliminary review of the draft rule identified above, we have no comments at this time. Please direct any questions in this regard to me at (415) 947-4115 or to James Shears at (213) 244-1810.