

## KEVIN J. WILLIAMS

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**From:** Steckel, Andrew <Steckel.Andrew@epa.gov>  
**Sent:** Monday, March 07, 2016 9:56 AM  
**To:** KEVIN J. WILLIAMS; Sutkus, Carol@ARB  
**Cc:** Shears, James; Drake, Kerry; Tong, Stanley  
**Subject:** EPA comments on Sacramento Rule 464



**United States Environmental  
Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901**

March 07, 2016

### Transmittal of EPA Rule Review Comments

**To:** Kevin Williams, Sacramento Metropolitan Air Quality Management District  
[kjwilliams@airquality.org](mailto:kjwilliams@airquality.org)  
Carol Sutkus, California Air Resources Board  
[csutkus@arb.ca.gov](mailto:csutkus@arb.ca.gov)

**From:** Andrew Steckel, Rulemaking Office Chief  
[steckel.andrew@epa.gov](mailto:steckel.andrew@epa.gov)

**Re:** Sacramento Metropolitan Rule 464, Organic Chemical Manufacturing Operations,  
February 24, 2016

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..

**KEVIN J. WILLIAMS**

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**From:** Steckel, Andrew <Steckel.Andrew@epa.gov>  
**Sent:** Monday, April 04, 2016 10:14 AM  
**To:** KEVIN J. WILLIAMS; Sutkus, Carol@ARB  
**Cc:** Shears, James; Drake, Kerry; Tong, Stanley  
**Subject:** EPA no comment on Sacramento 464



**United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901**

April 04, 2016

**Transmittal of EPA Rule Review Comments**

**To:** Kevin Williams, Sacramento Metropolitan Air Quality Management District  
[kjwilliams@airquality.org](mailto:kjwilliams@airquality.org)  
  
Carol Sutkus, California Air Resources Board  
[csutkus@arb.ca.gov](mailto:csutkus@arb.ca.gov)

**From:** Andrew Steckel, Rulemaking Office Chief  
[steckel.andrew@epa.gov](mailto:steckel.andrew@epa.gov)

**Re:** Sacramento Metropolitan Rule 464, Organic Chemical Manufacturing Operations, April 28, 2016.

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.