

Ozone RACT Rules and Permitting

KALE WALCH, PCAQCD

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Surface Coating RACT Rule

Pinal County Air Quality permits currently require Reasonably Available Control Technology (RACT) for surface coating operations in the ozone nonattainment area.

- Historically we have looked to Maricopa County RACT rules and incorporated those provisions into permit conditions.
 - This includes VOC lb/gallon limits, application requirements, recordkeeping and monitoring
- Depending on the type of surface coating the proposed RACT rule may change the VOC lb/gallon limit

Existing Sources

Most existing surface coating operations in the nonattainment area have taken or are in the process of taking a 2.9 ton per year (tpy) limit on their Volatile Organic Compound (VOC) emissions

- Staying below 3 tpy qualifies them for a lower fee category

The proposed RACT rule exempts sources that take an enforceable limit to stay below 2.7 tons per year of VOC

- Effectively existing sources could take a 2.6 ton per year limit to avoid implementing the proposed RACT rule
- Existing sources may want to retain their RACT requirements to avoid Photochemically Reactive Solvent (PRS) requirements

Photochemically Reactive Solvents

An existing Pinal County rule requires sources in the Apache Junction and San Tan Valley area that emit more than 40 lbs per day of VOCs and that use Photochemically Reactive Solvents (PRS) to either:

- Install a control device or
- Implement RACT

Also known as the 40 lb rule

- PCAQCD Code §5-9-278 thru 280

Options for Surface Coating

Options for complying with the 40lb rule and the proposed RACT rule

- Take permit conditions to implement the RACT rule fully (for sources with actuals at or over 2.7 tpy)
- Do not use PRS compounds (the recordkeeping is onerous) to comply with the 40 lb rule and take a VOC limit to stay below 2.7 tpy so that the RACT rule does not apply
- Take a limit to use less than 5 gallons per day of paints and solvents (most common) to comply with the 40 lb rule and take a VOC tpy limit to stay below 2.7 tpy so the RACT rule does not apply
 - The less than 5 gallons per day limit effectively limits VOC emissions to less than 40 lbs per day
- Take a VOC limit of 1.9 tpy to qualify as a Small Surface-Coating Source (SSCS) or a 55 gallon per year limit for all coatings to qualify for low usage to comply with the 40 lb rule and the RACT rule
 - SSCS and low usage sources have to implement the cleanup of application equipment, work practices-handling, disposal, storage, monitoring and recordkeeping provisions of the RACT rule
 - SSCS and low usage sources are exempt from the RACT surface coating standards (VOC lb/gal limits), application methods and emission control system requirements (metal coating facilities still have VOC lb/gal limits)
- Different combinations of the above are theoretically possible, but these appear the most likely

Gas Stations

Existing Pinal County Air Quality permits require stage I vapor recovery at retail gas stations in the ozone nonattainment area. The proposed RACT rule formalizes this requirement.

The proposed RACT rule formalizes recordkeeping and monitoring requirements such as leak rate, cracking pressure and static pressure tests

The proposed RACT rule does not require stage I vapor recovery on non-resale gasoline dispensing operations less than 120,000 gallons per year and at farm operations

So far it appears most if not all existing retail gas stations have stage I vapor recovery installed

Contact

Kale Walch

Pinal County Air Quality

520-866-6860

kale.walch@pinalcountyz.gov