

Introduction

Section 110(l) of the Clean Air Act (CAA) indicates that EPA cannot approve a state implementation plan (SIP) revision if the revision would interfere with any applicable requirement concerning attainment and reasonable further progress, or any other applicable requirement of the CAA. When revisions to these rules are made, the Act requires that an analysis is made to verify that the rule will not be relaxed in a way that would be impermissible under Section 110(l). This demonstration is being submitted for public comment because the Division of Air Quality (DAQ) is proposing amendments to R307-343.

Proposed Amendment Summary

1. The rule applicability threshold will be lowered from 2.7 tons per year potential to emit to 20 gallons or more of VOC containing coatings and solvent usage combined. The new applicability level will discriminate between homeowners and hobbyists who conduct coating operations from commercial/industrial sources.

Air Quality Impact Analysis: The rule will apply to more sources which will positively impact air quality.

2. The coating categories in R307-343 are being updated to current types of coatings used in the industry. We are also separating out the types of polyurethanes that currently fall under the topcoat or sealer category.

Air Quality Impact Analysis: Modifying the rule to update the coating types that are currently in use does not have an air quality impact.

3. The VOC limits for the 2 component polyurethanes are being slightly elevated from 0.9 to 1.0 lb VOC/lb solids because of the difficulty of transferring these viscous coatings to the wood surface under the current VOC limits. Staff has worked with the coating industry to derive the lowest workable VOC limits for these categories.

Air Quality Impact Analysis: The minor VOC limit increase may result in increased VOC levels, although those levels would be considered to be de minimus. We estimate that 191 additional sources with estimated VOC emissions of 116 tons per year would be newly regulated by reducing the rule applicability to 20 gallons/yr. These added controls would more than mitigate the VOC limit increase and subsequently result in a positive air quality impact.

4. Exempting canned coating products that are less than 22 fl. Oz. and used exclusively for touch-up or repair are exempt. EPA guidance recommends this exemption, and this exemption can also be found in other comparable state rules.

Air Quality Impact Analysis: The exemption is considered to be de minimus and would easily be mitigated by proposal #1 above.

5. Changing the form of the cleaning solvent from a density limit to vapor pressure.

Air Quality Impact Analysis: The form change does not cause a relaxation of the limit because the proposed vapor pressure is comparable to the existing density limit.

Clean Air Act 110(l) Demonstration
Air Quality Impact of Amendment to
R307-343, Emissions Standards for Wood Furniture Manufacturing Operations



Conclusion: The proposed amendments to R307-343 will result in an air quality improvement overall.

Public Comment

DAQ is accepting public comment on this demonstration from July 1 to July 31, 2017. Comments can be submitted by e-mail to Jkarmazyn@utah.gov or by mail to:

Joel Karmazyn
DAQ
PO Box 144820
195 North 1950 West
Salt lake City, Utah 84114-4820