

**SYNOPSIS OF
PROPOSED AMENDMENTS TO THE RULES OF THE
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION
RELATING TO AIR QUALITY, CHAPTER 391-3-1**

Rule 391-3-1-.01, “Definitions,” is being amended.

Purpose: This rule is being revised to update the definition of “Procedures for Testing and Monitoring Sources of Air Pollutants,” also known as PTM.

Main Features: The definition of “Procedures for Testing and Monitoring Sources of Air Pollutants” is revised to reference the most recent version of the PTM.

Rule 391-3-1-.02(2)(a)6, “VOC Emission Standards, Exemptions, Area Designations, Compliance Schedules and Compliance Determinations,” is being amended.

Purpose: The purpose of the amendment is to remove the reference to certain rules from the applicability provisions. The applicability provisions for these rules are being added to the rules themselves.

Main Features: The references to Rules 391-3-1-.02(2)(t), (w), (y), (z), (ii), (jj), and (mm) are removed from subparagraphs 391-3-1-.02(2)(a)6.(i)(I) which specifies the applicability for sources that are located outside 13 specific counties and emit less than 100 tons per year of volatile organic compound emissions. (Facilities located outside these 13 counties that emit 100 tons per year or greater are subject to the listed rules.) The references to Rules 391-3-1-.02(2)(t), (w), (y), (z), (ii), (jj), and (mm) are removed from subparagraphs 391-3-1-.02(2)(a)6.(i)(III) which specifies the applicability for sources located within 13 specific counties that have actual VOC emissions of less than 15 pounds per day. (Facilities located within these 13 counties that have actual emissions of 15 pounds per day or greater are subject to the listed rules.)

Rule 391-3-1-.02(2)(t), “VOC Emissions from Automobile and Light-Duty Truck Manufacturing”;
Rule 391-3-1-.02(2)(w), “VOC Emissions from Paper Coating”;
Rule 391-3-1-.02(2)(y), “VOC Emissions from Metal Furniture Coating”;
Rule 391-3-1-.02(2)(z), “VOC Emissions from Large Appliance Surface Coating”;
Rule 391-3-1-.02(2)(ii), “VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products”;
Rule 391-3-1-.02(2)(jj), “VOC Emissions from Surface Coating of Flat Wood Paneling”;
Rule 391-3-1-.02(2)(mm), “VOC Emissions from Graphic Arts Systems”; and
Rule 391-3-1-.02(2)(ddd), “VOC Emissions from Offset Lithography and Letterpress”; are being amended.

Rule 391-3-1-.02(2)(vvv), “VOC Emissions from Surface Coating of Miscellaneous Plastic Parts and Products”;
Rule 391-3-1-.02(2)(yyy), “VOC Emissions from the Use of Miscellaneous Industrial” Adhesives;
Rule 391-3-1-.02(2)(zzz), “VOC Emissions from the Fiberglass Boat Manufacturing”; and
Rule 391-3-1-.02(2)(aaaa), “Industrial Cleaning Solvents” are being added.

Purpose: The requirements of the U.S. EPA’s September 2006, September 2007, and September 2008 Control Techniques Guidelines are incorporated into Georgia’s existing rule. The compliance date for the new requirements is January 1, 2015. These revisions are required in order for U.S. EPA to re-designate the Atlanta ozone nonattainment area to attainment. Should Atlanta be re-designated to attainment for the 1997 National Ambient Air Quality Standard for ozone standard prior to the compliance date of the new requirements, the new provisions will be moved to “contingency measures” and only will be required if they are necessary should Atlanta later exceed the ozone standard.

Main Features: Each new rule or rule revision contains 1) new emission standards and/or work practice standards as required by the CTG; 2) new and revised definitions; 3) applicability requirements for the current standards that remain in effect until January 1, 2015; 4) applicability requirements for the new standards that become applicable on January 1, 2015; 5) applicability requirements for any current standards that will continue to apply after January 1, 2015; 6) a provision that the new standards will not be required if the Atlanta ozone nonattainment area is re-designated to attainment for the ozone standard prior to January 1, 2015; and 7) a schedule for submitting permit applications, completing construction, and full compliance for any modifications that are necessary for a facility to comply with the new requirements. The specific subparagraphs in each new and revised rule associated with these provisions are shown below.

Chapter 391-3-1

Rules for Air Quality Control

	New standards	Definitions	Applicability for current standards	Applicability for new standards	Applicability for current standards that will remain in place after 1/1/2015	Provision for attaining standard prior to 1/1/2015	Compliance Schedule
391-3-1-.02(2)(t), VOC Emissions from Automobile and Light-Duty Trucks	2	8	9, 10	11	12	13	14
391-3-1-.02(2)(w), VOC Emissions from Paper Coating	3, 4, 5	6	7, 8	9	10	11	12
391-3-1-.02(2)(y), VOC Emissions from Metal Furniture Coating	3, 4, 5, 6, 7, 9	10	11,12	8, 13	14	15	16
391-3-1-.02(2)(z), VOC Emissions from Large Appliance Surface Coating	3, 4, 5, 6, 7, 9	10	11, 12	8, 13	14	15	16
391-3-1-.02(2)(ii), VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products	2, 3, 4	8	9, 10	11	12	13	14
391-3-1-.02(2)(jj), VOC Emissions from Surface Coating of Flat Wood Paneling	3, 4, 5, 6	7	8, 9	10	11	12	13
391-3-1-.02(2)(mm), VOC Emissions from Graphic Arts Systems	3, 4	5	6, 7	8(i), 8(iii)	8(ii), 9, 10, 11	12	13
391-3-1-.02(2)(ddd), VOC Emissions from Offset Lithography and Letterpress	2, 4, 5, 6, 7, 8	9	10, 11, 12	3, 13(i), 13 (iv)	13(ii), 13(iii)	14	15
391-3-1-.02(2)(vvv), VOC Emissions from Surface Coating of Miscellaneous Plastic Parts and Products	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16	17	n/a	12, 14, 18	n/a	19	20
391-3-1-.02(2)(yyy), VOC Emissions from the Use of Miscellaneous Industrial Adhesives	1, 2, 3, 4, 5, 6, 7, 8	9	n/a	10	n/a	11	12
391-3-1-.02(2)(zzz), VOC Emissions from Fiberglass Boat Manufacturing	1, 2, 3, 4, 5, 6, 7, 8	9	n/a	10, 13, 14, 15	n/a	11	12
391-3-1-.02(2)(aaaa), Industrial Cleaning Solvents	1, 2	4	n/a	3, 5	n/a	6	7

STATEMENT OF RATIONALE
Rules for Air Quality Control

Rule 391-3-1-.01(nnnn) Definition of “Procedures for Testing and Monitoring Sources of Air Pollutants” or “PTM”

The basis of this rule is to provide definitions for terms used in the Georgia Air Quality Control Rules, Chapter 391-3-1. The purpose of this revision is to reference the most recent version of the Procedures for Testing and Monitoring Sources of Air Pollutants.

This revision is administrative in nature and does not incur any additional costs to the Environmental Protection Division or the regulated industry.

Rule 391-3-1-.02(2)(a)6. – VOC Emission Standards, Exemptions, Area Designations, Compliance Schedules and Compliance Determinations

The basis of this subparagraph is to specify applicability thresholds, the counties where the rules apply, specific exemptions, compliance schedules, and the compliance determination methods for specific volatile organic compound (VOC) regulations. The purpose of the revision is to remove references to several VOC regulations. The applicability provisions for the rules that are removed from the general provisions are now specified within the rules themselves.

This revision is administrative in nature and does not incur any additional costs to the Environmental Protection Division or the regulated industry.

Rule 391-3-1-.02(2)(t) – VOC Emissions from Automobile and Light-Duty Truck Manufacturing;

Rule 391-3-1-.02(2)(w) - VOC Emissions from Paper Coating;

Rule 391-3-1-.02(2)(y) - VOC Emissions from Metal Furniture Coating;

Rule 391-3-1-.02(2)(z) - VOC Emissions from Large Appliance Surface Coating;

Rule 391-3-1-.02(2)(ii) - VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products;

Rule 391-3-1-.02(2)(jj) - VOC Emissions from Surface Coating of Flat Wood Paneling;

Rule 391-3-1-.02(2)(mm) - VOC Emissions from Graphic Arts Systems;

Rue 391-3-1-.02(2)(ddd) - VOC Emissions from Offset Lithography and Letterpress;

Rule 391-3-1-.02(2)(vvv) - VOC Emissions from Surface Coating of Miscellaneous Plastic Parts and Products;

Rule 391-3-1-.02(2)(yyy) - VOC Emissions from the Use of Miscellaneous Industrial Adhesives;

Rule 391-3-1-.02(2)(zzz) - VOC Emissions from the Fiberglass Boat Manufacturing; and

Rule 391-3-1-.02(2)(aaaa) – Industrial Cleaning Solvents

The basis of these subparagraphs is to specify Reasonably Available Control Technology (RACT) requirements for the control of volatile organic compound (VOC) emissions from various source categories. The purpose of these revisions is to incorporate the requirements of U.S. EPA's 2006, 2007, and 2008 Control Techniques Guidelines (CTG) for sources in the 20-county Atlanta ozone nonattainment area.

Affected sources in this area will have to comply with the new requirements by January 1, 2015, unless the Atlanta nonattainment area is re-designated back to attainment prior to January 1, 2015. The 20-county metropolitan Atlanta area was designated nonattainment in 2004 based on the ozone standard adopted by EPA in 1997. Because the area did not attain the standard by 2007, the nonattainment designation classification was changed by EPA from "Marginal" to "Moderate" in 2008. Since 2010, air quality data monitoring data has shown that Atlanta is meeting this 1997 ozone standard. U.S. EPA has acknowledged this fact by publishing a "clean data determination" in the Federal Register on June 23, 2011. EPD is currently developing a plan to ensure that Atlanta will continue to meet this ozone standard and a request for EPA to re-designate the area to attainment. Upon approval of this plan and request, U.S. EPA will publish a notice in the Federal Register re-designating the area to attainment for the 1997 ozone standard. If this occurs prior to January 1, 2015, the new and revised requirements of these rules will not become applicable. Instead, the requirements will become part of a "contingency plan" and would be considered for implementation if Atlanta later fails to meet the standard and implementation of these requirements would help to bring the area back into attainment.

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Rules for Air Quality Control

The new and revised rules, as associated with each of U.S. EPA's Control Techniques Guideline, are as follows:

September 2006 Control Techniques Guidelines (Group II)

Revisions to existing rule 391-3-1-.02(2)(jj), VOC Emissions from Surface Coating of Flat Wood Paneling;

Revisions to existing rule 391-3-1-.02(2)(mm), VOC Emissions from Graphic Arts Systems;

Revisions to existing rule 391-3-1-.02(2)(ddd), VOC Emissions from Offset Lithography and Letterpress; and

New Rule 391-3-1-.02(2), Industrial Cleaning Solvents.

September 2007 Control Techniques Guidelines (Group III)

Revisions to existing rule 391-3-1-.02(2)(w), VOC Emissions from Paper Coating;

Revisions to existing rule 391-3-1-.02(2)(y), VOC Emissions from Metal Furniture Coating; and

Revision to existing rule 391-3-1-.02(2)(z), VOC Emissions from Large Appliance Surface Coating.

September 2008 Control Techniques Guidelines (Group IV)

Revision to existing rule 391-3-1-.02(2)(t), VOC Emissions from Automobile and Light-Duty Trucks;

Revisions to existing rule 391-3-1-.02(2)(ii), VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products;

New Rule 391-3-1-.02(2)(vvv), VOC Emissions from Surface Coating of Miscellaneous Plastic Parts and Products;

New rule 391-3-1-.02(2)(yyy), VOC Emissions from the Use of Miscellaneous Industrial Adhesives; and

New Rule 391-3-1-.02(2)(zzz), VOC Emissions from the Fiberglass Boat Manufacturing.

The additional costs to the Environmental Protection Division and the regulated industry are similar to what is required in other ozone nonattainment areas that are classified as "moderate" or above by U.S. EPA. Based on available information, it is estimated that there are 60 facilities that would be subject to the new requirements. Of these, EPD estimates that up to 16 facilities will have to make operational or physical modifications to reduce emissions at a total annualized cost of \$290,379 or less. These costs would be the same if the federal government were to implement these requirements. Should EPA re-designate Atlanta to attainment for the ozone standard prior to January 1, 2015, there will be no additional cost to the Division or regulated industry.