

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
ADVISORY COMMITTEE MEETING
September 22, 2020
MINUTES

Chair Sara Head convened the meeting at approximately 6:00 p.m.

I. Director's Report

Dr. Laki Tisopulos, Air Pollution Control Officer, began by referring to Mr. Ali Ghasemi's comments made prior to the meeting which shared how VCAPCD is presenting 5 rule amendments tonight, 74.2 to satisfy a federal contingency measure, 74.15 to satisfy state BARCT implementation requirements, and 74.6, 74.6.1, and 74.24.1 to satisfy federal RACT deficiencies. Dr. Tisopulos reiterated that none of the proposed amendments were any more stringent than what other neighboring districts had adopted, and the changes should be viewed as non-controversial.

II. Call to Order

Chair Sara Head called the meeting to order at approximately 6:10 p.m.

III. Roll Call

Present

Michael Hughes
Richard Nick
Tom Lucas
Alice Sterling
Andy Sobel
Sara Head
Paul Meehan
Randy Chapman

Joan Burns
Jay Berger
Kim Lim
Donald Bird
Edward Carloni
Stephen Frank
Steve Colome

Absent

Hugh McTernan

Staff

Laki Tisopulos
Tyler Harris

Ali Ghasemi
Danny McQuillan

Public

Cindy Stine
Olivia Pehanick

Representing

Procter & Gamble
All4

IV. Minutes

Sara Head commented that the meeting minutes for August 25, 2020 Advisory Committee meeting referred to see attached slides, yet none were provided presuming that was available Sara Head asked if any members would like to make a motion to approve the minutes. Michael Hughes moved to approve the minutes of the August 25, 2020 Advisory Committee Meeting. Andy Sobel seconded the motion. The Committee voted 9 yes, 0 no, with 6 abstentions due to not being present at the last meeting.

V. Comments from the Committee

Sara Head shared that this section should be titled Comments from the Committee. There were no further Committee comments.

VI. Public Comment

There were no public members present.

VII. Old Business

There was no Old Business.

VIII. New Business

Proposed Amendments to Rule 74.2 Architectural Coatings

Danny McQuillan provided an overview of the proposal to amend Rule 74.2, and a brief PowerPoint presentation. This proposal is to reduce ROC emissions from architectural coatings to follow the state's SCM published in 2019. The proposal creates 4 new coating categories, reduces ROC content for nine existing coating categories, and creates a new category for colorants.

There was discussion about what industries would be affected by the proposed changes and sell-through requirements. It was explained that 74.2 regulates both consumer purchased, and contractor used coatings used on buildings, appurtenances, and structures and the main industry that it affects is retail sales. Staff confirms that sell through provisions allow the existing non-compliant supplies in the state to be sold without the burden of cost falling on retail operations and that compliant coatings have already been available in SCAQMD territory to our south.

There was discussion about discussions received at the workshop and afterwards. Staff confirmed that all responses were included in the Advisory Committee Package and all concerns raised have been addressed and taken care of.

There was discussion about how the proposed changes compared to state and federal standards and how the costs compared with the proposed amendments. Staff responded that federal standards are not very stringent, and cost estimates are, in reality, even less than what was proposed by the SCM report resulting in a cost effectiveness better than \$1.85 per lb of ROC reduced.

There was discussion about how product quality and expected lifetime of these reduced ROC coatings compare to older, higher ROC coatings. Staff responded that SCAQMD experience and research demonstrated that lower ROC coating technology in application today are as effective, perform better and have longer lifetimes than older solvent borne coatings. Specialty coatings such as Industrial Maintenance coatings require higher ROC content for their continued durability concerns, which are reflected in the proposed content limits.

There were concerns voiced about the cost of \$1.85 per pound of ROC reduced being too high a cost to pass onto consumers. Staff shared that compliant coatings have already saturated the market, and the actual cost to consumers is much less than this.

There was discussion about the colorant categories, and how they're applied; why non-compliant colorants would be still be available as an additive but only compliant colorants could be used by color mixers at retail locations. Staff explained that this provision to allow non-compliant colorants to be sold to consumers for personal use was intentional by the ARB as a result of their research and staff did not have further insight as to why.

A recommendation to the Board to adopt the proposal to amend Rule 74.2 was moved by Jay Berger and seconded by Joan Burns. The Committee voted to recommend approval of the proposed amendments with 13 votes in favor and Thomas Lucas and Stephen Frank voting against due to costs being pushed onto consumers and cost effectiveness concerns. There was one abstention from Hugh McTernan who came in late.

Proposed Amendments to Rule 74.15 Boilers, Steam Generators and Process Heaters

Danny McQuillan provided an overview of the proposal to amend Rule 74.15, and a brief PowerPoint presentation. This proposal is to reduce NOx emissions from boilers, steam generators and process heaters with rated heat input capacities of 5 million British thermal units (BTU) per hour or greater. The proposed emission limits will apply, on January 1, 2021, to new, replacement, or modified boilers, steam generators and process heaters with rated heat input capacities of 5 million BTU/hr or greater. The proposal creates 5 categories, with separate limits depending on what is technologically and economically feasible at reducing NOx emissions from subjected equipment.

There was discussion about how the proposed limit was determined. Staff shared that limits were based on recently amended rules by neighboring districts, at which point cost effectiveness was used to determine the more effective limits to propose.

There was discussion about any subsidies for facilities required to retrofit and if these amendments would affect employment in the county. Staff confirmed that we are unable to provide incentives for equipment required to meet regulatory limits and there is no expected change in employment as the result of these amendments.

There was discussion about any cost savings associated with the retrofit. Staff shared that the updated burners which meet the new standard are more efficient and would result in a cost savings for facilities and the lifespan of these burners is 15 years.

There was discussion about who were the large-scale operators of this equipment. Staff confirmed that there were many industries which operated equipment subject to Rule 74.15 but there was no one facility which had more than a handful of units and comments received from SoCalGas was in the interest of the customers of their natural gas.

A recommendation to the Board to adopt the proposal to amend Rule 74.15 was moved by Paul Meehan and seconded by Hugh McTernan. The Committee voted to recommend approval of the proposed amendments with 16 votes in favor and no votes against. There were no abstentions.

Proposed Amendments to Rule 74.6 Surface Cleaning and Degreasing, 74.6.1 Batch Loaded Vapor Degreasers, and 74.24.1 Pleasure Craft Coating and Commercial Boatyard Operations

Danny McQuillan is provided an overview of the proposal to reduce solvent ROC content limits for Rule 74.6, and ROC content of coatings in Rule 74.24.1. Staff is also proposing to eliminate exemptions for halogenated solvent use from Rules 74.6 and 74.6.1. Although Rules 74.6, 74.6.1, and 74.24.1 were determined by Ventura County Air Pollution Control District (VCAPCD or District) staff to satisfy RACT requirements, EPA staff requested specific modifications to rule language to prove equivalency and is the reason for these amendments; to implement EPA requests.

There was discussion about the difference between antifoulant coatings for pleasure craft and commercial craft. Staff explained that pleasure craft antifoulants are glossy with an emphasis on aesthetics while commercial antifoulants are ablative with a focus on protection quality. It was also mentioned how commercial vessels tend to stay in the water longer, while pleasure craft often are removed many times a year, if not stored on a dry dock.

There was discussion about difficulty that facilities have in obtaining specialty solvents subject to Rule 74.6 which meet current limits, and that it seems impossible to obtain solvents which comply with the new limits. Staff reassured the commenter that in the rule is a provision which allows less than 1 gallon per week of non-compliant solvents.

There was discussion about 75.24.1 requirements and whether it applies to just commercial applications or DIY projects as well. Staff shared that 74.24.1 requirements apply to pleasure craft and commercial vessel coatings that are applied by contractors in addition to what is sold at retail locations to be used by the consumer.

There was a question about cost-effectiveness of 74.24.1 amendments. Staff shared that due to these limits being required by EPA, cost-effectiveness analysis was not needed to be done as these limits were considered RACT.

There was additional discussion about the high costs of operating such facilities, and whether this impacted the local boat yard's ability to do business. Staff shared that affected facilities have been in communication with Staff to ensure their ability to remain competitive in the market. The addition of a commercial antifoulant category was as a result of industry's comments.

There was discussion about whether or not the Navy was exempt from these proposed changes to 74.24.1. Staff shared that the Navy would not be considered a boat yard, but one of the permitted boat yards serviced Navy vessels and influenced the recommendation for a commercial vessel subcategory for antifoulant coatings.

There was a question about whether we had received comment from Airports about reducing ROC contents of solvents. Staff shared how these requirements have been communicated to all facilities which use solvents in the District and these standards are considered the lowest, least restrictive option for our District as recommended by EPA. Staff also shared that 74.13 regulates aerospace coating solvents for most facilities at the airport.

A recommendation to the Board to adopt the proposal to amend Rule 74.6, 74.6.1, and 74.24.1 was moved by Ed Carloni and seconded by Andy Sobel. The Committee voted to recommend approval of the proposed amendments with 16 votes in favor and no votes against. There were no abstentions.

IX. Adjournment

Having no further business, the Chair adjourned the meeting at approximately 7:20 p.m.

Prepared by:

Danny McQuillan
Air Pollution Control District Staff