

P-aw
May 27, 1971

T. R. MATTHEWS - D-7010
R. W. LAURRELL - D-7010
S. R. MILLER - D-7026
J. C. RICHARDS - D-7028
G. I. MULHOLLAND - D-7012

R. G. BROWN - DETROIT
J. D. FERM - WT-750
P. J. GRUNWALD - WT-1000
M. PAPPAS - D-8012
W. S. ZISCT - MARSHALL LAB.

F. & F. PRODUCTS - HYDROCARBON EMISSIONS

As discussed in Pollution Bulletin dated April 26, 1971, and May 3, 1971, it is likely that our paint products will have to conform to Los Angeles Rule 66 or a modified version of it by the end of 1972. To assist in evaluating the impact of Rule 66 on particular product lines, a copy of Rule 66 is attached along with a brief summary given below.

The purpose of Rule 66 is to reduce the amount of photochemically reactive solvent emitted. The definition of a photochemically reactive solvent is defined in Section 66 k. A solvent system is conforming if it contains less than the prescribed amount of reactive solvents, and non-conforming if it contains more than the prescribed amount.

For architectural coatings (defined in 66-1d) it is unlawful to sell or use a coating which contains a non-conforming solvent system. (66-1a, b, and c)

For industrial coatings (all coatings outside the definition in 66-1d) the limitations as to the type and amount of solvent allowed depends on whether or not the coating is heat polymerized or dried by solvent evaporation. Table I lists the allowable emissions per source (as defined in Section 66 a and b). A ruling by the Los Angeles Air Pollution Control District has defined "heat polymerized" as a process where cross-linking occurs. Thus, forced solvent evaporation by heating would not be considered heat curing if no other reaction takes place during the heating.

All industrial coating systems would be in the solvent evaporation category during the spraying operation regardless of whether or not the coating is subsequently heat polymerized. Thus, with a conforming solvent system, controls may be required for the baking oven exhaust but not for the spray booth exhaust.

N38451

TABLE I

INDUSTRIAL COATINGS-ALLOWABLE EMISSIONS

SOLVENT COMPOSITION

	<u>conforming</u>	<u>non-conforming</u>
Air Dried	Can be used in unlimited quantity.	Limited to 40 lb./day or 85% overall reduction of total solvent.
Heat Cured	Limited to 15 lb./day or 85% overall reduction regardless of solvent composition.	

It should be understood that Rule 66 is a local pollution law. State or local implementation plans will probably be similar but not necessarily identical to Rule 66. For instance, the definition of heat cured and photochemically reactive solvent may be slightly changed. Rule 66 may be used as a broad guideline but should not be considered as the law of the land at this time.

WILLIAM W. MILLER
POLLUTION CONTROL COORDINATOR

WWM/ps