



Rule 336 Clarification

Issue: In the coating limits tables in Rule 336 (Surface Coating Operations), when would “Multi-Component Coating” or “One-Component Coating” be chosen as the coating category?

Discussion: In the February 18, 2016 Stakeholder Workshop for Rule 336, the department was proposing that Rule 336 be revised to match the “Control Techniques Guidelines For Miscellaneous Metal And Plastic Parts Coatings” (EPA-453/R-08-003). In doing so, the “Other Metal Parts And Products” coating category was proposed to be deleted and “Multi-Component Coating” and “One-Component Coating” were proposed to be added. Stakeholders asked that the “Other Metal Parts And Products” coating category be retained, because up to 40% of the coatings used at some facilities fall within this category and that “Multi-Component Coating” and “One-Component Coating” not be added, because these coatings fall under the “Other Metal Parts And Products” coating category.

The department proposed in the Notice of Proposed Rulemaking for Rule 336 (published in the Arizona Administrative Register at 22 A.A.R. 1159, May 13, 2016) to retain the “Other Metal Parts And Products” coating category and to not add “Multi-Component Coating” and “One-Component Coating”; these coatings would be regulated by the “Other Metal Parts And Products” coating category.

After further review of Rule 336 and the “Control Techniques Guidelines For Miscellaneous Metal And Plastic Parts Coatings” (EPA-453/R-08-003), the department proposed in the Notice of Final Rulemaking to retain the “Other Metal Parts And Products” coating category and to add “Multi-Component Coating” and “One-Component Coating”. The intended purpose is that the “Multi-Component Coating” and “One-Component Coating” would be the chosen coating category only if the coating that is being applied would not fall into any of the specific coating categories listed in the coating limits tables in Rule 336.

Conclusion: “Multi-Component Coating” or “One-Component Coating” would be chosen as the coating category in the coating limits tables in Rule 336 only if the coating that is being applied would not fall into any of the specific coating categories listed in the coating limits tables in Rule 336.