



TO: Air Pollution Control District Board of Directors

FROM: Ron Tan

DATE: September 20, 2010

SUBJECT: Correction to the Rule 321 Board Package for the September 20, 2010 Board Hearing

Staff docketed a Rule 321 Board Package to you on September 1, 2010. Proposed Amended Rule 102, Definitions, which is part of the packet, contains a typographical error.¹ To correct this error, we have included a revised page 102 - 2 on the reverse side of this memorandum. Revised page 102 - 2 is hereby integrated into the September 20, 2010 Rule 321 Board Package, Attachment 4, Proposed Amended Rule Text.

¹ The *reactive organic compound* definition lists exempt compounds and assigns item numbers to them. The correct item number for *methyl chloroform (1,1,1-trichloroethane)* is “11” (not “12”).

“**Photochemically Reactive Solvent**” means any organic solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified below or which exceeds any of the following individual percentage composition limitations, referred to the total volume of organic solvent;

1. combination of hydrocarbons, alcohols, aldehydes, esters, ethers or ketones, having an olefinic or cyclolefinic type of unsaturation: 5 percent, or
2. combination of aromatic compounds with 8 or more carbon atoms to the molecule, except ethylbenzene: 8 percent, or
3. combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the above groups of organic compounds, it shall be considered as a member of the most reactive chemical group, i.e., that group having the least allowable percent of the total volume of organic solvents.

[. . .]

“**Reactive Organic Compound**” means any ~~volatile~~ compound containing at least one (1) atom of carbon, except for the following exempt compounds: [*Note: Compounds and text shown below in **bold** are additions to the “reactive organic compound” definition.*]

1. acetone
2. ammonium carbonate
3. carbon dioxide
4. carbon monoxide
5. carbonic acid
6. **dimethyl carbonate**
7. ethane
8. metallic carbides or carbonates
9. methane
10. methyl acetate
11. methyl chloroform (1,1,1-trichloroethane)
12. **methyl formate; HCOOCH₃**
13. cyclic, branched, or linear completely methylated siloxane compounds
14. methylene chloride
15. parachlorobenzotrifluoride
16. perchloroethylene (tetrachloroethylene)
17. the following four classes of perfluorocarbon (PFC) compounds:
 - a. cyclic, branched, or linear, completely fluorinated alkanes,
 - b. cyclic, branched, or linear, completely fluorinated ethers with no unsaturations,
 - c. cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations,
and
 - d. sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.
18. **propylene carbonate**
19. **tertiary-butyl acetate; C₆H₁₂O₂ (“acetic acid, 1,1-dimethylethyl ester”)**

Tertiary-butyl acetate (also known as t-butyl acetate or tBAC) shall be considered exempt as a reactive organic compound only for purposes of reactive organic compound emissions limitations or reactive organic compound content requirements and will continue to be a reactive organic compound for purposes of all recordkeeping, emissions reporting, photochemical dispersion modeling, and inventory requirements which apply to reactive organic compounds.