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Category: 48 – General VOC Issues

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

DATE: 11 OCT 1978

SUBJECT: Questions and Answers on 1979 SIP Revisions

FROM: G. T. Helms, Chief
Control Programs Operations Branch

TO: See Addressees Below

Enclosed is a compilation of the six monthly questions and answers memos put out to date plus questions and answers (dated January 12, 1978) from the January Air Branch Chiefs meeting. Also included are six new questions and answers.¹ The questions and answers are grouped by subject. I hope this will enhance the use of the memos in clarifying the 1979 SIP revision requirements. The date of the original memo follows each question.

Enclosures

Addressees:

Thomas Devine, Region I
William Baker, Region II
Howard Heim, Region III
Winston Smith, Region IV
Steve Retaplatt, Region V
Jack Divite, Region VI
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cc: R. Campbell
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¹ The six new questions and answers are identified by an asterisk as well as by date in parenthesis.

Enclosures

Q. Does Hawkins' August 4, memo on requirement for VOC RACT regulations mean that linear rollback and EKMA should no longer be used for the 1979 oxidant SIPs: Must detailed photochemical dispersion receding now be done? (9/8)

A. Mr. Hawkins' memo was not intended to discredit the use of less rigorous oxidant control strategy techniques such as rollback and EKMA. Further, it does not require detailed photochemical dispersion modeling in the 1979 SIPs for all large urbanized nonattainment areas. Instead, the memo was intended to provide consistency between the control requirements for urbanized and rural nonattainment areas. We believe that where conditions of uncertainty and/or lack of precision exist, it is the prudent course of action to regulate large VOC emitters in major urbanized areas to at least the same degree as similar sources in rural nonattainment areas.

Q. How should cutoff sizes be established in VOC regulations for large urbanized areas that get extensions beyond 1982 to attain the oxidant standard? (9/8)

A. The 100-ton per year limit does not apply here. If a State chooses to include a cutoff size other than one explicitly in the CTG documents, it should reflect a consideration of the nature of sources in an individual nonattainment area. It should not be arbitrarily derived. Factors such as the magnitude of emissions and the economics of control must be considered. You are encouraged to consult with OAQPS (John Calcagni) as individual cutoff limits are established.

Q. For purposes of the 1979 SIP submittal, do all 11 RACT categories contained in the first round of CTGs have to be adopted for rural nonattainment standard SIPs? (9/8)

A. Yes. RACT regulations for all 11 CTG categories must be included in the 1979 SIP for large 100 emitters (100 ton/yr potential emissions). However, practically speaking, there may not be any large point sources in certain CTG categories in some areas. A positive showing in the SIP submittal that no such size sources exist in the affected nonattainment area would obviously negate the need to require adopting of regulations for this or any other source category. Service stations can be assumed to be less than 100 tons without a detailed showing for the purposes of exempting rural areas from Stage I requirements.

Q. What is considered a "100 tons/year source" for the cutback asphalt category? (10/4)

A. Emissions from the CTG category result from several points and operations including the mixing plant, paving operations, and from the curing of the road surface itself. Because of the possible combinations of emission points, the cutback asphalt category would be viewed as an area source and any 100 ton calculations should consider all State, local, and private uses of asphalt in the nonattainment area. Accordingly, States should be encouraged to adopt limitations of the manufacture, sale, and use of cutback asphalt on a Statewide basis. However, such a limitation could be avoided in rural areas if

it can be demonstrated that the total emissions from the use of cutback asphalt in the entire area for which a strategy is being developed does not exceed 100 tons/year.

NOTE: Rest of memo is missing