

11/03/1978

VOC621103781

**Category:** 62 – Emission Inventory

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 11/3/78

SUBJECT: Volatile Organic Compounds Emissions Inventory

FROM: Walter C. Barber, Director  
Office of Air Quality Planning and Standards

TO: Director, Air and Hazardous Materials Division, Regions I, III-X  
Director, Environmental Programs Division, Region II

As a result of reviewing draft photochemical oxidant State Implementation Plans (SIPs) for some of the urbanized areas, I have become concerned over the content of such plans in the emissions inventory area. Specifically, in many instances the inventory summary presented in the draft SIPs do not conform to the recommended standard format. Consequently, the ability to compare base line emissions from one area to another is lost and, furthermore, the lack of specificity in the inventory leads one to question the validity of the inventory.

As you are aware, an important requirement of the 1979 SIP revisions is that of tracking reasonable further progress (RFP) through monitoring emissions reductions. Specifically, in order to allow new major construction, total actual emissions must decrease so as to represent RFP. Whenever EPA (or a State agency) proposes to grant or deny a construction permit, the affected industry, as well as those opposing the new construction, will scrutinize every aspect of the SIP, including the emissions inventory. For this reason, your staff should be reiterating to the States the need to develop their SIP inventories for volatile organic compounds (VOC) in accordance with the document, "Procedures for the Preparation of Emission Inventories for VOC." Furthermore, the standard EPA format (see enclosed memo dated March 16, 1978, from Richard Rhoads) should be strongly recommended to State agencies and contractors developing emission inventories. More importantly, the review of the 1979 SIP submittals should evaluate the VOC inventories for conformance with accepted inventory development procedures and overall creditability especially in the 103 urbanized areas developing nonattainment oxidant plans. The data collected to develop these inventories should become an integral part of both EPA's and the States' emissions data systems, otherwise, it will be difficult to track the emissions reduction of RFP or to identify trouble spots if air pollutant concentrations do not decrease with RFP objectives.

I am currently evaluating the data base of the National Emissions Data System (NEDS). In support of this task, I need your assistance. Specifically, I am requesting that in the course of evaluating the creditability of the VOC inventories, such inventories be checked against those emissions in the NEDS.

I would like to learn of the results of these comparisons as well as the reasons for any differences between the two inventories, especially where such differences exceed ten percent.

In summary, in anticipation of VOC inventories being subjected to great scrutiny and in anticipation of including the new SIP inventories into NEDS, I believe the SIP inventories must be valid and accurate. This goal can only be accomplished by stressing to the States the need to have the emissions inventories in the 1979 SIPs follow the suggested format and by evaluating inventories and identifying deficiencies including any differences between NEDS and the States' inventory. The Office of Air Quality Planning and Standards is examining the possibility of letting a contract to evaluate VOC emissions inventories. I am interested in hearing your views on these matters and whether the inventories in the urban areas designated nonattainment for photochemical oxidants in the States under your area of responsibility are supportable.

Enclosures

cc: C. Timm  
M. Knudson  
I. Dickstein