

11/07/1978

VOC481107781

Category: 48 – General VOC Issues

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

November 7, 1978

SUBJECT: Disposal Regulations for VOC

FROM: John Calcagni
Control Programs Operations Branch, CPDD (MD-15)

TO: Winston Smith, Chief
Air Programs Branch, Region IV

This is with regard to your memo on waste disposal regulations for VOC. As I discussed with Mr. Douglas Cook, unless waste disposal provisions are explicitly included in the Control-Technology Guidelines (CTG) for a source category, States need not adopt provisions for these VOC emissions. I do wish to note that CTGs for degreasing and petroleum marketing operations do include specific provisions and State regulations for these categories should address this in their regulations for these source categories.

The apparent source of the confusion on this issue is the sample VOC regulations prepared for Region V by SCA/Technology Division. This document included a generic VOC disposal provision based on California's rule 66.2 which prohibited improper disposal of reactive VOC. While a provision of this nature is commendable, it is not essential to an approvable SIP. Hence, we should approve any State submittal with a waste disposal provision and not discourage States from including such a provision, but its exclusion is not a basis for disapproval.

With regard to emission credits, the State should presume that CTG sources properly dispose of waste since waste disposal provisions are explicitly included in some CTGs and should not be a major problem in others. Additional credit can be claimed only where the State can document additional reductions in emission from a source complying with such a regulation.

If you have any other questions, please do not hesitate to call me at FTS 629-5365.

bcc: E. Tuerk
D. J. Borchers
M. Fast
S. Kuhrtz
I. Artico
R. Campbell
E. J. Steigerwald