

11/16/1978

VOC051116781

Category: 5 – Surface Coating of Automobiles

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

16 NOV 1978

Mr. Harry H. Hovey, Jr., P.E.
Director, Division of Air Resources
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Dear Mr. Hovey:

This is with regard to your letter of October 31, 1978, concerning volatile organic compounds (VOC) emission reductions at the General Motors (GM) plants. You requested that my office confirm its position on the expeditiousness of the STAPPA negotiated compliance program for GM auto and light truck assembly plant surface coating operations. We have reviewed the schedule as modified at the October 6, 1978, meeting in Lansing, Michigan, and concur with your judgment that from a national perspective, it is consistent with the Clean Air Act and Agency policies. Further, we agree that the program set forth is one that will result in substantial environmental benefits.

Accordingly, if a State adopts a regulation for the control of VOC from GM auto assembly plants in accordance with the control requirements and schedule negotiated by STAPPA, we would regard this as being expeditious and would accept such a regulation as approvable. I do wish to reiterate a point made at our September 22 meeting in Washington, however. Adoption of this schedule cannot be a basis to waive any statutory portion of the Clean Air Act. Each urban area must demonstrate attainment by the statutory deadlines, must demonstrate that reasonable further progress (as defined in the Administrator's February 24, 1978, memo) is achieved, and if an extension beyond 1982 is necessary, must comply with the provisions for such an extension.

I trust this will be sufficient to confirm our position on this schedule. I believe that STAPPA has done a commendable job in reaching a reasonable consensus under very tight time constraints on this very complex issue.

Sincerely yours,

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

cc: D. Hawkins
M. Durning
Director, Air and Hazardous Materials Division, Regions I-X