

12/22/1978

VOC471222781

Category: 47 – Compliance Date Extension

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

December 22, 1978

SUBJECT: Request for Response to Proposed Compliance Schedules by the New England Staff for Coordinated Air Use Management (NESCAUM)

FROM: Merrill S. Hohman, Director
Air & Hazardous Materials Division, Region I

TO: Walter C. Barber (MD-10)
RTP, NC 27711

On November 16th and 17th the New England Staff for Coordinated Air Use Management met in Lexington, Massachusetts to discuss common problems relating to the development of VOC regulations. Representatives from all 6 New England states and from New York and New Jersey decided upon a proposed regulatory compliance schedule which can be described as follows:

1. Category specific VOC regulations will be promulgated for 100 ton potential emission sources no later than July, 1979. (This date is probably realistic for New York, whereas all the New England states and New Jersey will have their regulations promulgated by March, 1979.)

Note: The 100 ton cutoff will not apply to degreasing, gasoline marketing and asphalt cutback source categories.

2. All sources affected by these regulations must be identified and registered by the Air Agencies no later than January, 1980.
3. Sources must be in compliance or under an order by July, 1980.
4. All sources must be in final compliance by July, 1982. (This means 100 tons and less than 100 ton sources.)

For sources less than 100 tons:

1. All smaller sources will be inventoried by July, 1980.
2. Regulations, where appropriate, for these sources will be adopted by January, 1981.
3. All regulations will call for interim dates of compliance.

In most cases, the schedule for the less than 100 ton sources will occur sooner than the outline proposed above. However, New York will need at least this amount of time.

As you will note, this schedule is based on statewide inventories regardless of urban area delineations. This means that if we approve this schedule we will receive more control in the long run than if we push for a shorter time frame to obtain control of smaller sources in urbanized areas only. The total number of less than 100 ton sources covered in the NESCAUM approach is greater than in EPA guidance, and the equity in terms of the economics of control for the sources is much better if the NESCAUM statewide approach is followed.

We ask that you give thorough consideration to approving this proposed schedule and that we receive a response as soon as possible. The Region I states will be holding hearings starting the first week in January. We would like to be able to comment on whether this approach is going to be approvable at these hearings.

Attachment - NESCAUM Minutes of 11/16-17, 1978 (not included)

cc: T. H. Helms -A & HM
All Regional Office Division Directors
All State Directors' Regions
State Directors for NJ and NY