

12/12/1979

VOC151212791

Category: 15 – Solvent Metal Degreasing

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

DATE: DEC 12 1979

SUBJECT: Exemptions for Degreasers

FROM: Richard G. Rhoads, Directors
Control Programs Development Division (MD-15)

TO: Director, Air and Hazardous Materials Division, Regions I-X

It has come to my attention that some States are including a weight rate exemption in degreasing VOC regulations applicable to urban nonattainment areas (>200,000 population) that cannot demonstrate attainment by 1982. For example, some States have included a 15 lbs/day and/or 3 lbs/hour weight exemption that effectively exempts from control cold cleaners (batch operated, non-boiling solvent degreasers typically found in automotive repair facilities).

A telephone survey of Regional offices has indicated that, in some instances, where weight exemptions for degreasers have been included in draft regulations, the States have revised the regulation to delete the exemption. States, such as Colorado, Delaware, and Wisconsin are included in this category. In other States, the weight exemption for degreasers has been cited as a deficiency in the State Implementation Plan (SIP) by the Regional Offices. Conditional approval of the SIP has been given to the States pending exclusion of the weight exemption from the degreasing regulation. States, such as Connecticut, Virginia, and Tennessee are in this category. In the majority of cases, States have not included a weight exemption in degreasing regulations.

The degreaser regulation policy guidance cited in my memorandum of September 7, 1978, to the Air and Hazardous Materials Division Directors, states that for urban nonattainment areas across the board exemptions for small sources (e.g., 3 lbs/day) should not be approved. However, conditional approval may be appropriate where the State agrees to remove the exemption. This policy guidance is reaffirmed.

Please contact Bill Polglase at (FTS 629-5251) should you have any questions on this memorandum.