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Category: 48 – General VOC Issues

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

DATE: 21 DEC 1979

SUBJECT: Telephone Conference on State of Virginia VOC
Regulations - December 13, 1979

FROM: G. T. Helms, Chief
Control Programs Operations Branch

TO: Jim Sydnor
Air Programs Branch, Region III

This memorandum is to confirm our telephone conversation of December 13, 1979 concerning issues involved in the State of Virginia VOC regulations.

A summary of major issues discussed and our recommendations are as follows:

1. 100-Ton Sources

Urban and rural nonattainment areas not needing an extension (by virtue of a demonstration of attainment by 1982) may have a source cutoff size of 100 tons per year. In these instances, Stage I, bulk plants, and small degreasers would be exempt. Cutback asphalt is controlled on an area basis, and as such, emissions generally exceed 100 tons/year. However, there may possibly be a few nonattainment areas (if they are small and are single county) where you can come up with emissions less than 100 tons per for cutback asphalt.

2. Cutback Asphalt

The rationale for the exemption of cutback asphalt coatings, such as tack coats, should be documented by the State of Virginia. A justification might show that this exemption is needed in the State because of unique technical problems or unique (case-by-case) economics. An acceptable alternative is to make a five percent equivalency showing.

3. Stage I

The proposed exemption based on a gasoline throughput of 20,000 gallons per month would not be acceptable for areas needing attainment date extensions (1987) unless the State can demonstrate that it complies with the five percent rule. Since Stage I controls generally do not represent 100 tons/year sources and would not have to be controlled under current policy in rural ozone nonattainment areas and areas not needing extensions, the 20,000 gallons/month throughput valve can be approved in these two cases. For areas needing an attainment date extension, we would accept an exemption based on a 10,000

gallons per month throughput or a tank size exemption for existing tanks less than 2,000 gallons and new tanks less than 250 gallons.

4. Degreasers

A recent policy memo dated Dec. 12, 1979, from Richard G. Rhoads to Director, Air and Hazardous Materials Division, Regions I-X, provides that, in urban nonattainment areas needing an extension until 1987, small degreasers should not be exempt.

5. Emission Inventory

Only if correction to the emission inventory emission factors will affect the attainment date would we concur with Regional disapproval. We suggest that you accept a categorical emission inventory and establish an EPA/State goal (possibly through grant negotiations) to secure a source-specific emission inventory.

6. Ford Plant

The State of Virginia has proposed a VOC emission limit of 4.8 lbs/gallon of coating (minus water) for automotive and light duty truck assembly plant topcoat applications. The CTG suggests a limitation of 2.8 lbs/gallon (minus water). In previous negotiations with the Ford Motor Company, they made the case, based on economics, that 3.6 lbs/gallons (minus water) for topcoat applications represented RACT in comprehensive control programs for a couple of specific plants in the midwest. This could well be the case in Virginia, and a control level of 3.6 might be more appropriate than 2.8, dependent upon plant life, economics, and other factors. EPA should be receptive to such a detailed plant-specific showing. However, the State of Virginia feels that since attainment by 1982 has been demonstrated by rollback with a lesser degree of control required, the 4.8 lbs/gallons emission limitation should be acceptable. EPA policy for urban nonattainment areas not needing an extension is that RACT is applicable on 100 tons per year or greater point sources. RACT for topcoat applications is as previously noted unless a demonstration is made that another, less stringent, emission limit represents RACT. It is our understanding that the Regional Office has no information in writing justifying as RACT the 4.8 lbs/gallon emission limitation for topcoat applications. Since no separate or satisfactory showing exists to demonstrate that the 4.8 lbs/gallon emission limit is more appropriately RACT (than either 2.8 or 3.6), then disapproval is recommended.

7. Benzene

The definition of VOC would include benzene from both coking and petroleum refinery operations. However, benzene from coking operations is excluded from fixed-roof storage tank CTG requirements. Petroleum liquids only should be controlled as defined in the CTG document.

8. Definition of VOC

The definition of VOC is cited in the CTG for, surface coating of cans, coils, paper, etc., (EPA-450/2-77-008, Appendix C, Page C-4). VOC is defined as any compound of carbon (excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate) that has a vapor pressure greater than 0.1 mm of Hg at standard conditions.

It is hoped that the above comments and/or recommendations will be helpful in your evaluation of the Virginia State Implementation Plan. Please contact Tom Helms (FTS 629-5226) should you have any questions.

cc: N. Swanson, Region III
H. Frankford, Region III
G. T. Helms
B. Nicholson
W. Polglase
D. Smith
T. Williams