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Category: 30 – Test Methods

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

OFFICE OF
AIR, NOISE, AND RADIATION

March 24, 1981

SUBJECT: Test Methods for the Set I and Set II
CTG Source Category

FROM: Edward F. Tuerk, Acting Assistant Administrator
for Air, Noise, and Radiation (ANR-443)

MEMO TO: Jack Divita, Chief
Air Programs Branch, Region VI

This is in response to your memorandum of February 10, 1981 to G. T. Helms concerning test methods for the Set I and Set II CTG source categories. A list of CTG source categories not covered by 40 CFR Part 60 test methods was requested.

This memorandum will also confirm the information Bill Polglase verbally transmitted by telephone to Donna Ascenzi of your staff on February 13, 1981.

We agree that you should propose conditional approval of regulations for the Set II CTG source categories submitted by the State of Texas on the basis that Texas commit to include test methods within the regulations for those sources which are not covered by the test procedures specified under 40 CFR Part 60 new source performance standards (NSPS). (Please also see the attached draft memo entitled "Clarification of VOC 'Test Method' Requirements.")

The following Set I and Set II CTG source categories are not covered by test methods specified under 40 CFR Part 60, Appendix A:

1. Bulk Terminals
2. Cutback Asphalt
3. Degreasers
4. Petroleum Refinery Fugitive Leaks
5. Perchloroethylene Dry Cleaning
6. Gasoline Tank Trucks

It is pointed out that proposed test methods for new source performance standards cannot be considered a part of 40 CFR Part 60, Appendix A test methods because the test methods are subject to change or exclusion before being incorporated into 40 CFR Part 60.

In addition, the Federal Register notice proposing action on the State of Texas regulations should state that EPA-approved test procedures should be used in conducting compliance tests when utilizing 40 CFR Part 60 test methods if the State does not include a test procedure in the regulation for the corresponding source category.

Should you have any questions on this matter, please call Tom Helms at 629-5526 or Brock Nicholson or Bill Polglase at 629-5516.

Attachment

Draft Memorandum From: Edward F. Tuerk, Acting Assistant Administrator for Air, Noise, and Radiation To: Director, Air and Hazardous Materials Division, Regions I-X Date: Subject: Clarification of VOC 'Test Method' Requirements

cc: Chief, Air Branch, Regions I-V, VII-X