07/24/1981 VOC600724811

Category: 0 — RACT

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

DATE: July 24, 1981

SUBJECT: Results of the Regional Survey of Studies Related to RACT Beyond the VOC CTGs

FROM: G.T. Helms, Chief
Control Programs Operations Branch (MD-15)

TO: Chief, Air Programs Branch, Regions I-X

The purpose of this memorandum is to summarize information received from Regional Offices concerning source categories and studies related to RACT beyond the VOC CTGs.

Regional source categories related to VOC sources that have the potential to emit more than 100 tons/year and for which there are no CTGs are listed in the attached Table I. In addition, proposed or current studies in Regions I, II, IV, V, and VI are shown in the table.

California VOC rule development activities for non-CTG source categories, along with planned studies as summarized by Region IX, are also attached.

Reports and document availability is uncertain. Please call specific Regions for information. Should you have other questions please contact the Technical Guidance Section (Brock Nicholson, FTS 629-5516).

Attachments

Attachment

TABLE I

Summary of Categories Identified by Regions
as Sources Requiring RACT Determinations

Region I

Porcelain glaze
Thread manufacture
Carburetor floats
Bakery
Organic chemicals
Aluminum die-cast foundry
Charcoal manufacture
1. Tanneries
Wood furniture manufacture
Plastics coater
Adhesives to rubber gaskets
Coating rubber parts with lacquer
Printed circuit boards
Adhesives (staples)

Studies:

1. Tanneries in the State of Maine have contracted with E. C. Jordan for control study--low solvent technology, process engineering, and add-on being considered.

Contact: Alan Dion (FTS 223-5630)

Region II

Wood furniture finishing - surface coating
Surface coating of aircraft
Fabric printing

Studies:

Background material developed by New Jersey in support of regulation [Sub chapter 16, Section 16.6] to be used to control all 100-tons/year sources not covered by CTGs.

Contact: Paul Truchan (FTS 264-2551)

TABLE I
(continued)
Summary of Categories Identified by Regions
as Sources Requiring RACT Determinations

Region IV

Neoprene rubber manufacturing
Acrylate manufacturing
Rolling mill lubricant control
Calcium carbide acetylene production
Furniture coating
Fiberglass boat building

Studies:

Region has contracted with Radian Corporation to develop technical information documents for the above-noted categories.

Contact: Doug Cook (FTS 257-2864)

Region V

Manufacture of paints, varnishes, lacquers, enamels, and allied products
Manufacture of adhesives and sealants
Manufacture of miscellaneous chemicals and chemical preparations
Manufacture of plastic materials and synthetic resins, rubber, and other man-made fibers
Manufacture of wood furniture

Studies:

1. States in Region V still in the process of determining 100-tons/year non-CTG sources.

2. Region to contract with Engineering Science in order to determine major non-CTG sources.

Contact: Barry Perlmutter (FTS 886-6049)

Region VI

Studies:

The State of Texas has initiated contractual effort with Radian Corporation to assess significant VOC sources in Harris County not covered by Texas regulations and to identify alternative control technologies and their cost-effectiveness.

Contact: Donna Ascenzi (FTS 729-1518)

TABLE I
(continued)
Summary of Categories Identified by Regions
as Sources Requiring RACT Determinations

Region VII

Power plants
Plastic coating
Automotive adhesives
Automotive solvent wipe and body cleaners
PE bag manufacture

Contact: Ken Greer (FTS 758-3791)

Region VIII

No sources greater than 100 tons/year not covered by a CTG.

Region IX

See attached document entitled "California VOC Rule Development Activities for Non-CTG Source Categories."

Contact: Tom Rarick (FTS 556-2463)

California VOC Rule Development Activities for

Non-CTG Source Categories

COMPLETED VOC RULES

1. Stage II Gasoline Vapor Recovery (GVR) - Stage II GVR rules have been adopted in all California ozone nonattainment areas. The State's model rule and certification procedures are attached. Additional background information can be obtained from the State if there is any interest.

2. Architectural Coatings - Rules controlling flat and non-flat architectural coatings have been adopted in all ozone nonattainment areas in California. A sample model rule and a background document are attached. There have been some problems with this measure in the last several months related to small manufacturers' acceptance of the non-flat limits.

3. Aerospace Coatings - The South Coast Air Quality Management District (SCAQMD) has adopted a rule for aerospace coatings (attached). A technical support document is currently being developed for this measure. A brief summary report has been prepared and is also attached.

4. Thermally Enhanced Oil Recovery (TEOR) - This measure has been adopted and partially implemented in Kern and Monterey Counties (rules attached). The regional office has a contract underway to determine emission factors for cyclic and drive TEOR wells. The study should be completed by this summer. The State is also developing a model rule for this source category which should be an improvement over the two District rules. The model rule should be ready by this summer.

5. Pharmaceutical and Cosmetic Manufacture - The SCAQMD has adopted a rule which extends the controls recommended in the synthetic pharmaceutical manufacturing CTG to cosmetic manufacturing operations and non-synthetic pharmaceutical manufacturing. Their rule and a brief technical support paper is attached.

6. Wood Furniture Manufacture — The SCAQMD has developed a measure for wood furniture manufacture (attached). A technical support document should be available by the end of the year. A brief summary report of this measure is attached.

REGULATIONS BEING DEVELOPED

1. Natural Gas and Oil Production Fugitives - Attached is a sample regulation and a technical support document for this category. This measure applies to gas and oil field fugitives in addition to gasoline and gas plant fugitives (a Group III CTG). The suggested control measure will be heard by the California Air Resources Board in late May. Also being developed are measures for sumps and pits and for heavy crude oil storage. Information on these measures should be available in the next four to six months.

2. Hazardous Waste Disposal - This measure will focus on solvent reclamation as an alternative to other methods of disposal. Solvents,

refinery wastes and truck bottoms will be examined. A technical support document and sample regulations should be available by mid-summer.

3. Rubber Manufacture - This measure will look at controlling emissions from gluing, molding and compounding natural and synthetic (neoprene) rubber products. A report should be ready by the fall of 1981. A draft summary report developed by the SCAQMD is attached.

4. Marine Vessels - California has developed rules requiring controls for lightering, loading, perging, tank washing, gas freeing, and ballasting operations. Several technical support documents are attached. These measures are scheduled to be completed by the end of this year, provided the legislature doesn't block the measure.

5. Marine Fuel Transfer - This measure will require Stage II GVR type controls for the refueling of pleasure craft. A more detailed description of this measure is attached. A sample rule will be ready by early summer.

PLANNED STUDIES

1. Vegetable Oils and Other Solvent Extraction Processes - California plans to develop a measure for this source category by the end of 1981. They will look at extending the controls available for vegetable oil processing to other solvent extraction processes. A draft summary report prepared by the SCAQMD is attached.

2. Automotive Refinishing - This measure is scheduled to be finished by 1981. Low solvent coatings and add-on controls will be evaluated.

3. Pesticides - Reformulation of pesticide carriers to either non-reactive organics or water-based carriers will be evaluated. A report on emissions from this category is attached. A report on the control measure is expected by November. This is expected to be a very difficult measure to develop.

4. Wineries - California is currently assessing the level of emissions from wineries to determine whether it is a category worth developing a control measure for. The measure may be extended to beer breweries as well. A preliminary analysis of beer brewery emissions is attached. Results of this study won't be available until 1982.

5. Plastic Fabrication - This measure will include the substitution of non-reactive blowing agents for foam polystyrene, and an assessment of controls for fiberglass fabrication. A report is expected by October 1981. A description of polystyrene manufacturing controls and a description of a planned study for fiberglass fabrication are attached.

6. Other Studies - The SCAQMD has prepared short draft evaluations of several other possible control measures. Evaluations addressing the following source categories are attached:

A. Marine Coatings
B. Additional Reductions for Automotive Assembly Line Coatings
C. Aerosol Spray Cans

D. Industrial Maintenance Coatings
E. Clean Fuel from Landfills

7. EPA Region 9 is funding an additional study to evaluate the following
additional control measures:

A. General Solvent Usage (Tightening Existing Controls)
B. Cutback Asphalt (Tightening Existing Controls)
C. Paper and Fabric Coating (Tightening Existing Controls)
D. Control of Abandoned Oil Well Vents
F. Herbicides

This study should be available by the end of the summer.