

10/26/1981

VOC451026811

Category: 45 – Criteria for Plan Revisions for Nonattainment Areas

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

DATE: October 2, 1981

SUBJECT: VOC Regulation for the 1982 SIP

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

TO: William A. Spratlin, Chief
Air, Noise, and Radiation Branch, Region VII

This is in response to your memo of August 14, 1981 concerning the 1982 ozone SIP submittal for Missouri. These issues have been discussed on several occasions with members of your staff and this memo is to confirm the-verbal responses. The questions are discussed below in the same order as listed in your memo.

1. We agree that all coating operations at an auto assembly plant are not covered under the automotive surface coating CTG. Specifically, the operations mentioned in your memo are not a part of the automotive CTG. However, these operations as well as other miscellaneous coating operations at auto assembly plants may be covered under the miscellaneous metal parts CTG. On the other hand, some of the operations may not be covered under any CTG. A case-by-case determination would have to be made.

A memo from Richard Rhoads dated July 31, 1981, "Applicability of VOC Control Technique Guidelines to the Automobile Manufacturing Industry," discussed the applicability of the automotive and miscellaneous metal parts CTGs to the surface coating operations at auto assembly plants. A copy of this memo is attached.

As you are aware, any remaining uncontrolled sources over 100 TPY would have to have RACT level controls applied per the 1982 ozone SIP policy.

Concerning RACT controls for those operations in auto assembly plants that fall under the miscellaneous metal parts CTG, most States' regulations are requiring the same control levels that were outlined in the Volume VI CTG for the coating of miscellaneous metal parts.

To my knowledge, there was never an agreement or understanding between EPA and the auto manufacturers that the miscellaneous coating operations at auto assembly plants would be exempt from control.

2. Operating restrictions on permits may be used to define potential to emit. Thus, a State could set emission limits in a source's operating permit in order to keep emissions below 100 TPY.

Such operating permits would have to be submitted as part of the SIP so as to be Federally enforceable. A more complete discussion can be found in the attached memo from Richard Rhoads dated August 22, 1980 "The Use of Permit Conditions to Define Potential to Emit."

If you have additional questions, please call the Technical Guidance Section, Tom Williams (629-5516).

Attachment

cc: Wayne Leidwanger

Attachment

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

DATE: August 14, 1981

SUBJECT: VOC Regulations for the 1982 SIP

FROM: William A. Spratlin
Chief, Air, Noise and Radiation Branch

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

In reviewing progress the State of Missouri is making towards development of the 1982 SIP for St. Louis, two issues have been raised regarding the development of VOC regulations. These issues may have implications for other areas in the country and we are requesting policy guidance from your office.

The State of Missouri has informed us that there are a few operations at the automotive assembly plants in St. Louis which are not covered by the surface coating or the miscellaneous metal parts CTGs. These processes include such operations as solvent wipedown before painting; application of adhesives and sealers, and installation of noise deadening materials. Each of these operations apparently emit more than 100 TPY. Prior to developing RACT, the state has questioned whether EPA ever had an understanding with the auto manufacturers not to control these operations when the agreement was reached on the surface coating limits. Also, because these processes are not booth-type operations, we would appreciate any information you may have on developing similar RACT controls for plants in other areas. To date, we have seen only limited information.

The second issue concerns about six sources which have potential emissions greater than 100 TPY but actual emissions are far less (probably in the range of 25-50 TPY). Instead of writing control regulations, the state would prefer to set emission limits' in the sources' operating permits which would keep emissions below 100 TPY. Because the actual emissions from these sources are small, we are inclined to agree with the state's approach. Nevertheless, a clarification of the 1982 SIP policy regarding RACT for major sources is needed. If the state's suggestion is accepted, are we correct in assuming that the operating permits would have to be submitted as part of the SIP?

We have discussed these questions on a preliminary basis with Tom Williams. We would appreciate a quick response because the available time for the state to develop regulations is becoming limited. If you have any questions, please call Wayne Leidwanger or Ken Greer at FTS 758-3791.

cc: Ken Greer