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**Category:** 40 – CTG Group III

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

DATE: November 4, 1981

SUBJECT: Status of State Action on Group III and  
Beyond Source Categories

FROM: Bill Polglase  
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TO: G. T. Helms, Chief  
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THRU: Brock Nicholson, Chief  
Technical Guidance Section

A telephone survey was made of Regional VOC contacts regarding the activity of States in their Region in developing VOC regulations for Group III and other 100-tons per year sources subject to RACT. This report generally covers the status of the States' activities as of October 1981.

Although most States appear to be progressing in developing emission inventories and locating 100-tons per year sources; little is being done regarding the development of regulations for Group III or other source categories. However, there are several States that have existing regulations or draft or model regulations that may be applicable. For example, the State of New Jersey has a catch-all VOC regulation (Section 16.6) that they may utilize to control all 100-tons per year sources not directly effected by the Group I or II CTGs. In addition, parts of the State of California have regulations in effect that would be applicable such as SOCOMI fugitive emissions and petroleum solvent dry cleaning regulations. In addition, model regulations have been developed for source categories such as natural gas/gasoline plants.

With regard to Group III source categories, most States are waiting to see if the Group III CTGs are to be issued and also the States are waiting for guidance from EPA as to what to do and how to do it before developing any additional regulations. Many States feel they do not want to waste resources by going ahead without EPA guidance.

A listing of States that have requested extensions until 1987 to meet the ozone standard is shown in Table I.

A summary of information obtained from the Regional contacts regarding action by the States on Group III and beyond source categories is shown in Table II.

Attachments

cc: D. Stonefield/J. Pearson

Attachment

TABLE I

States That Have Requested  
Extensions Until 1987

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Region I	Connecticut, Massachusetts, and Rhode Island
Region II	New York and New Jersey
Region III	Delaware, District of Columbia, Maryland, Pennsylvania, and Virginia
Region IV	Kentucky and Tennessee
Region V	Illinois, Indiana, Michigan, Ohio, and Wisconsin
Region VI	Texas
Region VII	Missouri
Region VIII	Colorado and Utah
Region IX	California
Region X	Oregon and Washington

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TABLE II

Summary of Action by the States on  
Group III and Beyond Source Categories

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Region I

Contact: Cynthia Greene

3 States affected: Connecticut, Massachusetts, Rhode Island

Status: o States have emission inventories.  
o No other action - Massachusetts has formally requested  
guidance on developing regulations.

Region II

Contact: Paul Truchan

2 States affected: New York, New Jersey

Status: o New York taking wait and see attitude, looking at sources -  
may use permit system to control major sources.  
o New Jersey has catch-all regulation (Section 16.6). They  
will probably use this regulation to control non-CTG sources.

Region III

Contact: Neil Swanson

5 States affected: Delaware, District of Columbia, Maryland, Pennsylvania,  
Virginia

Status: o All States have good emission inventories.  
o Not looking at regulatory development.  
o Waiting on CTGs for Group III.  
o Waiting for EPA policy on what to do and how to do it.

Region IV

Contact: Doug Cook

2 States affected: Kentucky, Tennessee

Status: o States have emission inventories.  
o Waiting for guidance from EPA.  
o No action on regulations.  
o Do not want to waste resources by going ahead without  
EPA guidance.

Region V

Contact: Dick Dalton

5 States affected: Illinois, Indiana, Michigan, Ohio, Wisconsin

Status: o States have emission inventories.  
o Region verifying emission inventories in some areas through  
contract with Engineering Science.  
o States making little progress in Group III and beyond.

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TABLE II  
(Continued)

Summary of Action by the States on  
Group III and Beyond Source Categories

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Region VI

Contact: Donna Ascenzi

1 States affected: Texas

Status: o Texas has completed study of sources - only Harris County  
affected  
o Expect regulations from the State.

Region VII

Contact: Wayne Leidwanger

1 State affected: Missouri

Status: o State not going to develop Group III regulations until  
guidance provided.  
o Other sources greater than 100 tons/year may be controlled  
by conditioning operating permits so that emissions cannot  
be greater than 100 tons/year.

Region VIII

Contact: Dave Joseph

2 States affected: Colorado, Utah

Status: o Colorado doing some studies; i.e., outside coatings.  
o Utah waiting for guidance.

Region IX

Contact: Tom Rarick

1 State affected: California

Status: o Some districts have already adopted regulations such as  
SOCMI fugitive and petroleum solvent dry cleaning.  
o State has model regulations such as natural gas/gasoline  
processing plants.  
o SCAQCD studying sources beyond CTGs in their district.

Region X

Contact: Ken Lepic

2 States affected: Oregon, Washington

Status: o States waiting for CTGs.  
o Nothing happening on regulations.

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