

02/12/1982

VOC260212821

**Category:** 26 – Bubbling

ROUTING AND TRANSMITTAL SLIP

DATE: February 12, 1982

TO: VOC Contacts  
Regions I-V, VII-X

REMARKS:

The attached material will provide information on how a VOC RACT issue is being handled in Oklahoma. Should you have any questions on this or similar RACT bubble situations, please give either Tom Williams or me a call (629-5516).

cc: Tom Helms

FROM: Brock Nicholson, Chief, TGS

ROOM NO.: MD-15

PHONE NO.: FTS 629-5516

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

DATE: February 9, 1982

SUBJECT: Acceptability of Oklahoma's Demonstration Concerning the Surface  
Coating of Miscellaneous Metal Parts and Products

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

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

The February 3, 1982 memo describing Oklahoma's equivalency demonstration with the miscellaneous metal parts CTG has been reviewed. Our understanding of the demonstration is detailed below.

Tulsa County has only two major (100 T/yr) sources that would have to be controlled if Oklahoma developed a RACT regulation. These sources have made significant reduction in VOC emissions. These major sources are also on an enforceable compliance program to convert to high solids paints. Hence, it is arguable that these compliance programs represent RACT.

In addition, minor sources (< 100 T/yr) in Tulsa County will achieve a 12 percent reduction from applying the general surface coating regulation that has been in effect since 1979. Therefore, the total reductions in Tulsa County will be at least equivalent to those that would be obtained if Oklahoma developed a specific regulation, with the CTG limitations, for the two major sources.

If our understanding is correct, then the demonstration is acceptable. I recommend that the information in your February 3, 1982, memo be included in the technical support document.

Attachment

Attachment

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

DATE: February 3, 1982

SUBJECT: Acceptability of Oklahoma's Demonstration Concerning the Surface Coating of Miscellaneous Metal Parts and Products

FROM: Jack S. Divita, Chief  
Air Branch

TO: Tom Helms, Chief  
Control Programs Operations Branch, CPDD (MD-15)

As requested during the conversation between Donna Ascenzi of my staff and Tom Williams of your staff, we are sending our calculations which indicate that Oklahoma's state-wide surface coating regulation will achieve equivalent reductions as compared to a RACT regulation for the surface coating of miscellaneous metal parts and products, when applied to both major and minor sources in Tulsa County.

1977 Inventory for Surface Coating Sources in Tulsa Co.

Armco	408 tons/yr
American Airlines	139 tons/yr
minor sources	399 tons/yr
	<u>946 tons/yr - total</u>

Based on information from the Tulsa City-County Health Department, Armco has reduced emissions by 61% from 1974 to 1981. Factoring the reductions over the 8 year period, as would be done when determining reasonable further progress (RFP) would result in a 38% reduction from 1977 to 1981 or a reduction of 155 tons. American Airlines has reduced emissions by 23% from 1975 to 1980. Again, factoring the reductions over the 6 year period would result in a 15% reduction from 1977 to 1980 or a reduction of 21 tons.

For the minor sources, the State has assumed that their regulation will achieve a 12% reduction or a reduction of 48 tons. Therefore, the State's regulation would result in a total of 224 tons reduced.

For a RACT regulation, only the 2 major sources would be considered. For conversion to high solids paint, the CTG document for source category indicates a 50-80% reduction is achievable. Since both sources are on a program to convert to high solids paint, a 65% reduction was assumed to constitute RACT for this control technology. Therefore, under RACT, American could achieve a reduction of 90 tons and Armco could achieve a reduction of 139 tons. (The reduction for Armco reflects a 34% reduction which is proportional to the 42% reduction which the State specified was available on the basis of 80% RACT). Therefore, a RACT regulation would result in a total of 229 tons reduced. When compared to the 224 tons achievable through the State's coating regulation the difference between the reductions is insignificant.