

04/21/1983

VOC260421831

Category: 26 – Bubbling

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

DATE: April 21, 1983

SUBJECT: Averaging Time - VOC Equivalence
or Compliance Calculations

FROM: Bill Polglase
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THRU: Brock Nicholson, Chief
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As requested, the following presents a summary of EPA guidance provided to Regional Offices and others concerning the use of averaging times utilized in calculations for VOC bubbles.

1. Memorandum dated November 21, 1978, from Richard G. Rhoads, Director, Control Programs Development Division to Director, Air and Hazardous Materials Division, Regions I-X, concerning "RACT Options for Can Coating Operations."

In this memorandum, it is stated "In order to encourage low solvent technology as well as maintain enforceability, the Can Manufacturing Institute has proposed that States include provisions to allow a RACT bubble on a daily weighted average. We feel that a SIP submittal with such a provision would be acceptable."

2. Letter dated May 1, 1979, from Richard G. Rhoads, Director, Control Programs Development Division to Mr. David M. Benforado, P.E., Supervisor, Environmental Legislation and Regulations, 3M Company, St. Paul, Minnesota.

In this letter, it was stated "We have received no indication that a monthly average could be technically justified. However, if hourly or daily averaging were shown to be infeasible or unreasonable, we could accept an enforceable regulation based upon a longer averaging time."

3. Federal Register notice dated December 8, 1980, signed by David G. Hawkins, Assistant Administrator for Air, Noise, and Radiation, concerning "Compliance With VOC Emission Limitations for Can Coating Operations." It states "This memorandum notifies State and local agencies that in EPA's view, in general, their regulations may be interpreted as allowing a daily weighted average for approving permits and compliance plans without further regulatory changes or SIP revisions. EPA is encouraging this approach."

4. The requirement for a daily average (unless technical necessity justifies a longer period) is reiterated in the April 13, 1982, Federal Register notice (page 15789) where final rulemaking required Anaconda Aluminum Company's Louisville, Kentucky, plant to achieve 85 percent VOC control efficiency based on a daily average. It was further stated that Anaconda will maintain detailed emission records for the calendar year 1982. These data will be used to ascertain the shortest averaging time the plant can meet.

5. New source performance standards for large appliances and for metal furniture promulgated on October 27 and 29, 1982, respectively, requires compliance calculations (not bubbles) based upon monthly averages for affected facilities (per unit basis).

6. Some States, such as Alabama, provide in their regulations that in some instances for VOC emissions, "compliance can be determined on a plantwide basis using a weekly weighted average." Michigan has proposed a monthly average on a case-by-case basis.

7. To our knowledge, no official guidance has been provided to Regional Offices concerning the requirement or the means of determining a daily maximum VOC cap for use in equivalency calculations. A daily cap is not required for new source performance standards.

8. Few SIP actions related to bubbles have been approved to date concerning extended allowable averaging times, i.e., averaging times of weekly, monthly, etc. A known example of this situation is the 3M Company in Bristol, Pennsylvania, which has a seven-day averaging time.

9. However, a summary of some of the averaging times in bubbles currently being considered by the Regions or States are as follows:

- A. Reynolds Aluminum, Virginia - 30-day, quarterly, and annual averages.
- B. Westvaco, Virginia - Weekly, 30-day, quarterly, and annual averages.
- C. Uniroyal Plastics, Ohio - 30-day average with a daily maximum.
- D. James Rivers Paper Company, Virginia - Quarterly, yearly.
- E. Packaging Corporation of American, Ohio - 30-day average with a daily maximum.