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VOC280628831

Category: 28 – Exempt Solvents

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

June 28, 1983

Ms. Carol K. Niemi and Mr. Paul M. Oteiza
Inorganic Chemicals Department
Chlorinated Solvents Section
Dow Chemical Company
Barstow Building
2020 Dow Center
Midland, Michigan 48640

Dear Ms. Niemi and Mr. Oteiza:

This is in response to your request that I clarify a possible misunderstanding by various parties concerning the proper method of excluding exempt solvents from volatile organic compound (VOC) calculations. In reviewing the example regulation language you submitted, it seems that some ambiguity exists regarding what VOC's are to be covered. It was not our intention to include exempt VOC in the calculation.

I agree that the most technically correct way to deal with exempt solvents is to subtract them out from coatings just like water with the ultimate value of interest being the mass of VOC per unit volume of coating less exempt solvent and water. However, since State Implementation Plans are State regulations, I suggest that you explore with the appropriate State agency an acceptable procedure to make the calculations. EPA Regional Offices are also available to assist with State-specific problems.

Should you have any questions, please contact the Technical Guidance Section (Brock Nicholson or Bill Polglase, 919/541-5516).

Sincerely yours,

G. T. Helms
Chief
Control Programs Operations Branch

cc: Eric Flowers
John Putton
Jim Wilburn