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Category: 48 – General VOC Issues

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

March 15, 1984

MEMORANDUM

SUBJECT: Reynolds and Westvaco Plant Proposed Ozone (03)
State Implementation Plan (SIP) Revisions

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

TO: Ray Cunningham, Director
Air Management Division, Region III

As requested, the proposed SIP revisions for the Reynolds and Westvaco plants located in Richmond, Virginia, have been reviewed and our comments follow.

General

With regard to the two above-noted SIP revisions, it is our opinion that no further delay in taking action on the proposals is warranted. We recommend that in both cases the SIP revisions be disapproved. The basis for this recommendation are:

1) Considering the information available to us, the emission limits adopted by the State do not appear to reflect reasonably available control technology (RACT).

2) The January 20, 1984, policy memorandum dealing with volatile organic compound (VOC) averaging times lists specific criteria for approval of VOC SIP revisions. This policy was a restatement of past guidance which has been issued some time before. These two actions appear to vary with Agency policy. Specifically, no persuasive justification is presented showing that the very long averaging times are needed, other than as a substitute for installing controls.

3) Both packages involve a number of unresolved policy issues presently under Agency review. In particular, credit for shutdown and offsets in nonattainment areas are of concern. A final determination of the applicability of their policy to the Westvaco and Reynolds situation cannot be made until Agency policy is issued.

A. Specific comments related to the Reynolds SIP revision are as follows:

1) The SIP revision submission lacks sufficient information on the combined plants involved to determine if the technology being applied represents RACT. There is insufficient detail to determine if some of the lines are applying coatings rather than painting. Also, the calculations of control effectiveness are not adequately explained. Finally, the evaluation of applicability of lowest achievable emission rate (LAER) for the new press which is replacing the shut down lines is not discussed. Staff from ESED are exploring the issues with the firm and will advise you of their findings in a subsequent memorandum.

2) Since the admission limits are expressed as a total tonnage limit based on full production, it would appear that the only time the firm would have to be concerned with a level close to RACT is when the plants are operating in full production. It would further appear that the State limit allows the company to take credit for downtime and nonproduction time, which is inconsistent with Agency policy (January 20, 1984 policy).

B. Specific comments with regard to the Westvaco SIP revision are as follows:

1) It appears that the control system proposed for the old plant would be RACT if the control equipment (carbon adsorption) were properly constructed, operated, and maintained. However, the State emission limits are considerably less stringent than the capabilities demonstrated for the facility and do not reflect RACT.

2) Subsequent test data submitted by the company for their new plant indicate that the control equipment operates with an annual 79.9 percent efficiency. The data further indicate that with the exception of two minor excursions (which may be artifacts of the data collection procedures rather than losses in control efficiency), the control equipment has operated for a year with a weekly average of no worse than 65 percent efficiency. This is considerably more effective than required by the SIP revision. It is particularly important that the adopted limits reflect RACT because "express reduction beyond RACT" can be used to reduce the amount of emission reductions achieved by other resources.

It is hoped that these comments will be helpful to you. If you have any questions please contact me or John Calcagni (on VOC RACT issues) or Brock Nicholson (on emission trading issues).