

06/19/1984

VOC270619841

Category: 27 – Solids Applied/Transfer Efficiency

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

June 19, 1984

MEMORANDUM

SUBJECT: Regional Survey--Volatile Organic Compound (VOC) Equivalency Calculation Procedures

FROM: William Polglase
Plans Analysis Section, CPOB (MD-15)

TO: John Calcagni, Chief
Plans Analysis Section, CPOB (MD-15)

As requested at the March 15, 1984, VOC compliance workshop, Regional VOC contacts surveyed the States in their respective Regions in an attempt to ascertain whether or not the States are correctly making VOC equivalency calculations on a mass of VOC per volume of solids basis. The reason for this request was that reportedly a number of States throughout the country were making equivalency calculations erroneously.

This memorandum is intended to summarize the results of the survey and to point out the need for national consistency and interstate continuity necessary when VOC equivalency calculations are made:

The survey indicates that the problem may exist to some degree in a number of States. Possibly one reason for this is that State regulations may not have a specific requirement that equivalency calculations must be made on a mass of VOC per volume of solids basis. Equivalency calculations were not required when the control technique guideline (CTG) documents were issued and the VOC regulation developed. However, since the advent of the emission trading policy, a number of guidance memoranda have been issued by the Control Programs Development Division clearly stating that VOC equivalency calculations must be made on a solids basis.

A number of EPA Regional Offices have conducted VOC equivalency calculation workshops or are planning such workshops in the near future. This should help the States in applying proper calculation procedures.

It is stressed that the survey by the Regional Offices is subjective in that VOC equivalency calculations were not checked. A summary of the responses to the survey are shown in Table I.

Attachment

cc: VOC Regulatory Contacts, Regions I-X
VOC Enforcement Contacts, Regions I-X

Air Branch Chiefs, Regions I-X
Ed Reich
Steve Hitte, SSCD
Tom Helms, CPDD

Attachment

Table I

Summary of Regional Surveys of State VOC Equivalency Calculation Procedures
(Solids Applied Basis)

<u>Region I</u>	<u>Region VI</u>
CT Agreed with solids-applied determination, but some errors in calculations	TX State using solids applied calculation method
MA Agreed with solids-applied determination, but some errors in calculations	LA Calculation method unknown
RI State follows solids-applied determination; rechecking past calculations	AK No applicable VOC surface coating regs.
NH Recently amended Reg's and SIP to indicate solids-applied followed	NM No applicable VOC surface coating regs.
ME No applicable VOC surface coating regs.	OK No applicable VOC surface coating regs.
VT No applicable VOC surface coating regs.	
	<u>Region VII</u>
	KS Calculation method unknown
	MO Calculation method unknown
	NE No applicable VOC surface coating regs.
	IA No VOC regulations
<u>Region II</u>	
NY No known calculation problems	<u>Region VIII</u>
NJ Problems in past calculations	CO Calculation method unknown-no special requirement in regulations that calculations must be on a solids basis
	UT Calculation method unknown-no special requirement in regulations that calculations must be on a solids basis
<u>Region III</u>	WY No VOC regulations
DE EPA approved acceptable	MT No VOC regulations
DC No VOC surface coating regs.	ND No VOC regulations
MD EPA approved acceptable	SD No VOC regulations
PA EPA approved acceptable	
VA Unsure of method correctness	
WV No VOC surface coating regs.	
<u>Region IV</u>	
FL Some degree of problem	
NC Some degree of problem	-----

SC Some degree of problem
 TN Some degree of problem
 KY Some degree of problem
 AL Unknown
 MS No VOC regulations

Region V

IL State using solids
 applied calculation
 method
 MI State using solids
 applied calculation
 method
 WI State using solids
 applied calculation
 method
 IN State using solids
 applied calculation
 method
 OH State using solids
 applied calculation
 method
 MN No VOC regulations

Region IX

CA Numerous districts in
 State-unsure of
 calculation procedures
 AZ No applicable VOC surface
 coating regs.
 NV No applicable VOC surface
 coating regs.

Region X

WA Calculations on a solids
 basis
 OR Calculations on a solids
 basis
 ID No VOC regulations
 WA No VOC regulations
