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Category: 39 – Definition of 100 Ton-Per-Year

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

June 25, 1984

MEMORANDUM

SUBJECT: Confirmation of Definition of "100-Ton-Per-Year (100 TPY) Source"

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

TO: James Wilburn, Chief
Air Monitoring Branch, Region IV

As a follow-up to our recent telephone conference call with the State of Alabama, attached are copies of guidance memos and a letter related to the definition of a 100 TPY source. These guidance documents all contain the principle of combining all similar or connected operations at a plant to determine 100 TPY.

1. Memorandum dated September 7, 1978, from Richard G. Rhoads, Director, Control Programs Development Division, to Director, Air and Hazardous Materials Division, Region I, III-X, and Director, Environmental Programs Division, Region II, entitled "Clarification of Degreasing Regulations."

However, States should not exempt all open top vapor degreasers or conveyORIZED degreasers which individually emit less than 100 tons/year in rural nonattainment areas because large scale users may have over 100 separate degreasing operations at one plant location. If a State chooses to exempt open top or conveyORIZED degreasing operations in rural nonattainment areas, the limitation should be 100 tons or less on a facility-wide basis based on annual solvent purchase records.

2. Memorandum dated August 8, 1980, from G. T. Helms, Chief, Control Programs Operations Branch, to John L. Hanisch, Mobile Source Emissions Section, Region I, entitled "Request for Confirmation of the Definition of a 100-Ton Source as Applied to Controls in the Gasoline Storage and Marketing Chain".

As stated in previous determinations of 100 tons/year sourcespotential emissions from all similar or connected CTG category sources on a facility-wide basis should be added together to determine if CTG control is requested. In the case of bulk gasoline terminals, this would be based on potential emissions from tank trucks (using the appropriate emission factor for splash

or submerged fill and the loading rack throughput) as well as potential emissions from storage tanks if they are located on contiguous or adjacent properties which are owned or operated by the same person (or by persons under common control).

3. Memorandum dated August 22, 1980, from Richard Rhoads, Director, Control Programs Development Division, to Thomas W. Devine, Director, Air and Hazardous Materials Division, Region IV, entitled "The Use of Permit Conditions to Define Potential to Emit."

However, it is pointed out that in determining if a bulk gasoline terminal is a 100 TPY source, the gasoline throughput of the terminal as well as the emissions from gasoline storage tanks at the facility must be added together.

4. Letter dated May 10, 1983, from William L. Polglase, Technical Guidance Section, to Victoria Martinez, Florida Department of Environmental Regulation, explaining that the 100 TPY potential emission exemption for graphic art systems applies to plantwide emissions, not to each printing line.

. . . this will confirm that the 100-ton per year exemption for existing graphic arts facilities affected by the graphic arts control technique guidelines, relates to plantwide emissions, not to each printing line.

5. Memorandum dated October 11, 1978, from G. T. Helms, Chief, Control Programs Operations Branch, to Chief, Air Branch, Regions I-X, entitled "Questions and Answers on 1979 SIP Revisions (Cutback Asphalt Category)."

Q. What is considered a "100 tons/year source" for the cutback asphalt category? (10/11)

A. Emissions from this CTG category result from several points and operations including the mixing plant, paving operations, and from the curing of the road surface itself. Because of the possible combinations of emissions points, the cutback asphalt category should be viewed as an area source and any "100 ton" calculations should consider all State, local, and private uses of asphalt in the nonattainment area. Accordingly, States should be encouraged to adopt limitations of the manufacture, sale, and use of cutback asphalt on a Statewide basis. However, such a limitation could be evoked in rural areas that can be demonstrated that the total emission from the use of cutback asphalt in the entire area for which a strategy is being developed does not exceed 100 tons/year.

It is hoped that these citations will be helpful in the resolution of the definition of a 100 TPY source with the State of Alabama.

cc: Chief, Air Branch, Regions I-X
VOC Contacts, Regions I-X

Attachments

1. Memorandum From: Richard G. Rhoads, Director, Control Programs Development Division
To: Director, Air and Hazardous Materials Division, Region I, III-X
Director, Environmental Programs Division, Region II
Date: September 7, 1978
Subject: Clarification of Degreasing Relations Requirements
2. Memorandum From: G. T. Helms, Chief, Control Programs Operations Branch
To: John L. Hanisch, Mobile Source Emissions Section, Region I
Date: August 8, 1980
Subject: Request for Confirmation of the Definition of a 100-Ton Source as Applied to Controls in the Gasoline Storage and Marketing Chain
3. Memorandum From: Richard Rhoads, Director, Control Programs Development Division
To: Thomas W. Devine, Director, Air and Hazardous Materials Division, Region IV
Date: August 22, 1980
Subject: The Use of Permit Conditions to Define Potential to Emit
4. Letter From: William L. Polglase, Technical Guidance Section
To: Victoria Martinez, Florida Department of Environmental Regulation
Date: May 10, 1983
Subject: TPY Potential Emission Exemption for Graphic Art Facilities
5. Memorandum From: G. T. Helms, Control Programs Operations Branch
To: Chief, Air Branch, Regions I-X
Date: October 11, 1978
Subject: Questions and Answers on 1979 SIP Revisions (Cutback Asphalt Category)