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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

DATE: May 17, 1983

SUBJECT: Guidance for Non-CTG RACT Determinations

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

TO: Harley Laing, Director
Air Management Division, Region I

This is in response to your memorandum of March 8, 1983, concerning guidance for non-CTG RACT determinations. Specifically, you requested information or references related to ten non-CTG sources submitted to you by the State of Massachusetts Air Pollution Control Agency.

We have attached a number of reference data that may be helpful for use in determining RACT for VOC sources with emissions greater than 100 tons per year (not covered by a CTG). In addition, for easy reference, we have attached copies of the table of contents for the following documents: (1) the Air Pollution Engineering Manual, (2) Controlled and Uncontrolled Emission Rates and Applicable Limitations for 80 Processes, (3) Control Techniques for Volatile Organic Emissions From Stationary Sources, and (4) Summary of Technical Information for Selected Volatile Organic Compound Source Categories. Each of these documents contain information on volatile organic compound processes, emissions, and means for their control.

Table I lists the ten non-CTG sources that you inquired about and includes a partial list of references related to each source.

Should the Regional Offices have additional reference materials (process information and/or regulations) that could be shared with other Regional Offices, perhaps it could be forwarded to our office for distribution to the other Regional Offices. In effect, this will provide a clearinghouse for dissemination of technical information related to VOC processes, emissions, and means of their control. Also, per your suggestion, we are exploring the feasibility of a more formal VOC emissions control clearinghouse.

Please contact the Technical Guidance Section (Brock Nicholson or Bill Polglase, FTS 629-5516) should you have any questions.

Attachments

cc: VOC Contact, Regions II – XIII, X, w/Enclosures
VOC Contact, Region IX, w/o California Enclosures

Attachments

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Source	References
Polystyrene and Plastic Manufacture	<p>A. "Controlled and Uncontrolled Emission Rates and Applicable Limitations for 80 Processes," EPA contract No. 68-02-1382, Task Order #12, dated 9/76.</p> <p>B. "Air Pollution Engineering Manual," second edition, AP-40, dated 5/73.</p>
10. Asbestos Gasket Manufacture	No specific reference data.

Other Sources

State of California index of rule development activities and associated memorandum and/or regulations as noted related to:

1. Polyester resin/fiberglass fabrication facilities, undated.
2. Polystyrene foam industry. dated 2/18/81.
3. Ethanol emissions from breweries, dated 11/20/80.
4. Draft 11-65 Rule 1124 "Aerospace Assembly and Component Coating Operations," dated 10/30/80 and associated Rule 1124.
5. Staff report for pharmaceutical rule, dated 4/14/80, and associated proposed Rule 1103 - Pharmaceuticals and Cosmetics Manufacturing Operations, dated 3/26/80.
6. Draft H-53 "Solvent Extraction," undated.
7. Draft H-119 "Clean Fuel From Landfills," dated 10/2/80.
8. Draft H-26 "Substitute Coatings Used in Industrial Maintenance," dated 10/17/80.
9. Draft H-xxx "Aerosol Spray Cans," dated 11/21/80.
10. Kern County Regulation 411.1 "Steam Drive Wells-Crude Oil Production."
11. Monterey Bay Unified APCD Regulation 427 "Steam Drive Crude Oil Production Wells."
12. Draft H-62 "Marine Fuel Transfer," dated 9/25/80.

NOTE: In addition, Region III, through their contractor, PEDCo Environmental, Inc., has developed preliminary draft documents for the following source categories:

- A. "Vapor Controls for Vehicle Tank Refueling at Retail Gasoline Service Stations."
- B. "Vapor Controls for Barge Loading of Gasoline."
- C. "Volatile Organic Compound Emission Controls for the Wood Furniture Industry."
- D. "Volatile Organic Compound Emission Controls for Tablet Coating at Pharmaceutical Plants."

- E. "Volatile Organic Compound Emission Controls for Petroleum Refinery Secondary Wastewater Separators."
- F. "Volatile Organic Compound Emission Controls for Witco Chemical Corporation Plant in Trainer, Pennsylvania."