07/11/1983 VOC250711831

Category: 25 – Gasoline Tank Trucks

ROUTING AND TRANSMITTAL SLIP DATE: 7/11/83

TO: CYNTHIA GREENE - REG. I

CYNTHIA:

THIS IS THE LETTER RELATED TO THE OPENING OF GASOLINE TANK TRUCK HATCHES THAT WE DISCUSSED TODAY. LET ME KNOW IF YOU NEED ANYTHING ELSE.

BILL

FROM: BILL POLGLASE PHONE NO.: FTS 624-5516

June 6, 1983

Mr. James Eslick
Shell Oil Company
1 Shell Plaza
Room 1315
Houston, Texas 77210

Dear Mr. Eslick:

This is in reference to your inquiry regarding the EPA's policy on leak-tight trucks. Specifically, you requested information on whether we prohibited the opening of hatch covers for purposes of inspection. This is of concern because visual inspection is often employed as a means of verifying delivery.

Enclosed is a speech given on July 12, 1976, at the 61st National Conference on Weights and Measures by Mr. Robert Ajax of the Emission Standards and Engineering Division of the U.S. Environmental Protection Agency. I call your attention to page 4:

> "These criteria require a leak-tight truck: however, they are not intended (and it is not our policy) to preclude the opening of hatch covers for inspection briefly before or after delivery."

I have explored this issue with the appropriate Agency personnel and have confirmed that there has been no change to the policy. However, I wish to reiterate that this applies solely to inspection. It is essential that the dome lid be properly sealed and the tank truck be vapor tight during the delivery and transport of gasoline.

I hope this satisfactorily addresses your concerns. Please call me (919/541-5665) if you need further assistance.

Sincerely yours,

John Calcagni, Chief
Plans Analysis Section
Control Programs Development Division

Enclosure

bcc: R. Walsh
R. Ajax
S. Shedd

Enclosure

Table I

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

Region I

CT Agreed with solids-applied determination, but some errors in calculations
MA Agreed with solids-applied determination, but some errors in calculations
RI State follows solids-applied determination; rechecking past calculations
NH Recently amended Reg's and SIP to indicate solids-applied followed
ME No applicable VOC surface coating regs.
VT No applicable VOC surface coating regs.

Region II

NY No known calculation problems
NJ Problems in past calculations

Region III

DE EPA approved acceptable
DC No VOC surface coating regs.
MD EPA approved acceptable
PA EPA approved acceptable
VA Unsure of method correctness
WV No VOC surface coating regs.

Region IV

FL Some degree of problem
NC 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

Region VI

TX State using solids-applied calculation method
LA Calculation method unknown
AK No applicable VOC surface coating regulations
NM No applicable VOC surface coating regulations
OK No applicable VOC surface coating regulations

Region VII

KS Calculation method unknown
MO Calculation method unknown
NE No applicable VOC surface coating regulations
IO No VOC regulations

Region VIII

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
WY No VOC regulations
MT No VOC regulations
ND No VOC regulations
SD No VOC regulations

Region IX

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

	Region X
IN State using solids applied calculation method	WA Calculations on a solids basis
OH State using solids applied calculation method	OR Calculations on a solids basis
MN No VOC regulations	ID No VOC regulations
	WA No VOC regulations

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