



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

May 22, 1986

MEMORANDUM

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

SUBJECT: Exemption of Negligibly Photochemically Reactive Compounds by the
State of South Carolina

FROM: Darryl D. Tyler, Director
Control Programs Development Division (MD-15)

TO: Winston Smith, Director
Air, Pesticides, and Toxics Management Division Region IV

This is to clarify my May 1, 1986 memorandum to you on South Carolina's proposed SIP revision exempting six volatile organic compounds (VOC) from their ozone SIP on the basis that they are negligibly reactive. Our disapproval of this SIP revision should be articulated in terms of compliance with EPA's "Recommended Policy on the Control of Volatile Organic Compounds" (42 FR 35314, July 8, 1977) and subsequent revisions (44FR 32042, 45FR 32424, and 45FR 48941). In these notices, EPA has listed those VOC's which we have determined to be negligibly reactive and which may be exempt from ozone SIP's. None of the compounds South Carolina proposes to exempt are on EPA's exempt list. Unless and until EPA makes a judgment on the reactivity of the Carolina compounds and adds them to the negligibly reactive list, we cannot approve SIP revisions exempting additional VOC's.

One additional clarification. We have not made any decision about whether to add additional VOC's to the negligibly reactive list. In particular, no decision has been made on whether to add perchloroethylene to the list as was proposed in 1983.

cc: K. Berry
R. Campbell
D. Rhoads
Chief, Air Branch, Regions I-X
VOC Contact, Regions I-X