



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

January 2, 1992

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Applicability of the EPA Capture Efficiency (CE) Protocols

FROM: G. T. Helms, Chief
Ozone/Carbon Monoxide Programs Branch

TO: David L. Calkins, Chief
Air Programs Branch, EPA Region IX

In an October 4, 1991 memorandum to David Sanders of OAQPS (attached), John Ungvarsky of Region IX raised several issues regarding the applicability of the EPA CE protocols. This memorandum addresses those issues, restating and clarifying EPA's position on the use of the CE protocols as was previously presented in an April 16, 1990 memorandum from John Seitz, formerly of the Stationary Source Compliance Division, to the Regional Division Directors (attached).

The EPA CE protocols were developed by the Chemicals and Petroleum Branch, Chemical Applications Section, and the Emission Measurement Branch to fulfill the need for an effective method to measure CE for coating sources that elect to reduce volatile organic compounds (VOC) emissions through the use of add-on control devices. Although the methodologies were originally developed for coating sources, there was no intent to limit their use solely to coating sources.

The CE protocols utilizing the temporary and permanent total enclosure criteria have a broad applicability, and may be used for any source category where CE must be determined. The methodologies are already being used by a few non-coating sources. For example, a facility in the Northeast that manufactures bubble wrap packaging material has built a permanent total enclosure for collection of product off-gassing emissions. All emissions are then routed to a control device.

The EPA is setting no bounds as to which protocols apply. Therefore, the CE protocols should be used as guidance for all sources which capture and conduct VOC emissions to control devices, and for which a CE determination is necessary. This includes control techniques guidelines (CTG's) non-CTG, coating, and non-coating sources.

There may be some cases where the CE protocols are not suitable, or where for some other reason a State may wish to adopt an alternative CE test method. If, for a given source or source category, a State feels it is necessary to consider another CE test procedure, the State must present the test procedure to your office and also to the Emission Measurement Branch of the Office of Air Quality Planning and Standards (OAQPS) for evaluation on a case-by-case basis. Then, if EPA determines the test method is an acceptable alternative to the CE protocols for the particular source or source category, the new method should be incorporated into a State implementation plan revision.

The OAQPS is considering conducting a workshop on the CE protocols, per John Ungvarsky's request. Staging such an activity will depend upon Regional demand for it, as well as the availability of travel funds. We will keep you informed as the project develops.

Attachments

cc: Karen Catlett
Carla Oldham
John Silvasi
Bill Johnson
David Sanders
Bob Stallings
David Cole
Gil Wood
Susan Wyatt
Jim Berry
VOC Policy Work Group

[Attachments not included here.]