

December 9, 1993

MEMORANDUM

SUBJECT: Credit for 15 Percent Rate-of-Progress Plans for Reductions from the Architectural and Industrial Maintenance (AIM) Coating Rule

FROM: John S. Seitz, Director
Office of Air Quality Planning and Standards (MD-10)

TO: Director, Air, Pesticides and Toxics
Management Division, Regions I and IV
Director, Air and Waste Management Division,
Region II
Director, Air, Radiation and Toxics Division,
Region III
Director, Air and Radiation Division,
Region V
Director, Air, Pesticides and Toxics Division,
Region VI
Director, Air and Toxics Division,
Regions VII, VIII, IX, and X

This memorandum supplements my memorandum of September 10, 1993 concerning State credit for reductions from the forthcoming Federal AIM coating rule. As you know, a number of States have indicated that reductions from this source category are crucial to their 15 percent rate-of-progress plans. In order to allow States to take credit for expected reductions from the Federal rule while still providing necessary safeguards, EPA will approve a committal State implementation plan (SIP) under section 110(k)(4) if the following conditions are met:

1. States must submit a SIP by April 1994 committing to adopt an AIM rule if EPA does not promulgate a national rule by February 1995.
2. The commitment must be to adopt and submit a State rule by March 1995 and to implement the rule and achieve reductions by November 1996.
3. Emissions reductions in the State-adopted rule must be equivalent to the committal SIP, or else a new plan must be submitted to make up the shortfall.

4. States that submit such a commitment will be allowed to take credit in their 15 percent rate-of-progress plans for these reductions.

If you have any questions or comments concerning this approach, please contact Laurel Schultz at (919) 541-5511.

cc: Kent Berry
Alan Eckert
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Rich Ossias

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John Silvasi
Laurel Schultz
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Bill Johnson
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THIS RESPONSE HAS BEEN COORDINATED WITH BILL BECKER
(STAPPA/ALAPCO) AND HOWARD HOFFMAN (OGC).