

Vacuum Producing Systems, Wastewater Separators and Process Turnarounds, EPA-450/2-77-025, October 1977; Petroleum Refinery Equipment, EPA-450/2-78-036, June 1978; Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2-78-047, December 1978; Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2-77-036, December 1977; Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/3-83-007, December 1983; Cutback Asphalt, EPA-450/2-77-037, December 1977; Perchloroethylene Dry Cleaning Systems, EPA-450/2-78-050, December 1978; Air Oxidation Processes in the Synthetic Organic Chemical Manufacturing Industry, EPA-450/2-83-006, March 1984. EPA has not yet developed CTGs to cover all sources of VOC emissions. Further interpretations of EPA policy are found in those portions of the proposed Post-1987 ozone and carbon monoxide policy that concern RACT, 52 FR 45044 (November 24, 1987) and "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations, Clarification to Appendix D of November 24, 1987 **Federal Register Notice**" (Blue Book) (notice of availability was published in the **Federal Register** on May 25, 1988). In general, these guidance documents are designed to ensure that VOC rules are fully enforceable and to strengthen the SIP.

State Submittal: Sections 1 through 9 of Regulation 24 include general applicability, monitoring, recordkeeping, compliance certification, and permit requirements and include definitions and other provisions common to more than one section. Regulation 24 applies to sources located in the entire state of Delaware. Sources that exceed any applicability threshold of Regulation 24 remain subject to the provisions even if the source's throughput or emissions later fall below the applicability threshold. Alternative control plans must be approved by the Department and the U.S. EPA. By November 15, 1993, owners or operators of sources claiming exemption from the surface coating provisions of sections 13 to 22 must certify to the Department that they are exempt and after November 15, 1993 are required to keep daily records documenting the daily VOC emissions and are required to report to the Department if any combined daily VOC emissions exceed 6.8 kg (15 lb). By November 15, 1993 owners or operators of sources subject to the surface coating provisions of sections 13 to 22 must certify to the Department the method of compliance—complying coatings, daily

weighted averaging, or control devices—to be used for each affected coating line or operation and are required to keep daily records demonstrating compliance and to report any excess emissions. By November 15, 1993 owners and operators of sources subject to the provisions of sections 23 to 43 must certify to the Department the method of compliance—control system equipment specification, leak detection and repair, coating formulation, work practice, etc.—to be used and are required to keep records for control devices and report excess emissions. Owners and operators of any coating line complying by the use of a control device are required to operate the capture and control device whenever the coating line is in use and are required to ensure the required monitoring system is installed, maintained and calibrated and in use whenever the control device is in operation. Owners or operators of facilities subject to sections 13 to 23 and section 37 are prohibited from using open containers to store or dispose cloth or paper impregnated with VOC or to store spent or fresh VOC used for surface preparation, cleanup or removal of coatings and are prohibited from using VOC to clean spray equipment unless equipment is used to collect the cleaning compounds. Owners and operators of sources subject to Regulation 24 that must make major process changes or major capital expenditures to comply must submit to the Department a compliance schedule within 180 days of the effective date of this regulation. Compliance must be as expeditious as practicable but not later than May 31, 1995.

EPA's Evaluation: The regulations listed above are approvable as SIP revisions because they conform to EPA guidance and comply with the requirements of the CAA.

State Submittal: Sections 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, and 23 of Regulation 24 cover coating operations or lines in the following source categories, respectively: automobile and light-duty truck, can, coil, paper, fabric, vinyl, metal furniture, large appliances, magnetic wire, miscellaneous metal parts and products, and flat wood paneling.

A. Common Provisions

A coating line or operation is subject to the emission limits of a section if the daily facility-wide VOC emissions from coating lines in that source category exceeds 6.8 kg (15 lb) without control devices. Each section requires that compliance be demonstrated in one of three ways: use of coatings that comply with the VOC content limits of each

section; use of coatings on a coating line whose daily weighted average comply with the VOC content for that coating line; or use of a capture and control system that provides an overall emission reduction that is the lesser of the reduction needed to be equivalent to the VOC content of complying coatings on a "solids basis" (mass VOC per volume of solids) or 95 percent. The VOC content limits in mass per volume of coating, minus water and exempt compounds, as applied, are the same as those contained in the applicable CTG. Section 20 exempts from the VOC content limits the use of up to 0.95 liters (0.25 gallons), in any 8-hour period, of quick drying lacquers used for repair of scratches and nicks on large appliances. Section 22 sets a standard of 0.52 kilograms per liter (4.3 lb/gal) of coating less water and exempt compounds for drum and pail interior coatings. The calculation procedures for daily weighted averaging and for required control device efficiency are provided in Appendix C. Calculations are required daily to demonstrate daily compliance.

B. Coverage of Section 22, Miscellaneous Metal Parts and Products

Section 22 applies to coating of miscellaneous metal parts and products, which include (but are not limited to) small and large farm machinery, small appliances, commercial machinery, industrial machinery, fabricated metal products, coating applications at automobile and light duty truck assembly plants other than prime, primer surfacer, topcoat and final repair, and to any other industrial category that coats metal parts or products under Standard Industrial Classification (SIC) Codes of Major Groups 33 to 39. Section 22 does not apply to the application of coatings regulated under sections 13, 14, 15, 19, 20, and 21, exteriors of completely assembled aircraft, automobile or truck refinishing, and customized topcoating of automobiles and trucks where the daily production is less than 35 vehicles per day. Section 22 does not apply to primer, primer surfacer, topcoat and final repair operations at automobile and light duty truck assembly plants covered under section 13.

EPA's Evaluation: The regulations listed above are approvable as SIP revisions because they conform to EPA guidance and comply with the requirements of the CAA. EPA has determined that the RACT standards are no less stringent than the applicable CTG.

State Submittal: Sections 24, 25, 26 and 27 cover bulk gasoline plants, bulk