

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

MAY 10 1983

Ms. Victoria Martinez
Engineer III
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Ms. Martinez:

This is in response to your letter of May 4, 1983, requesting written confirmation that the 100-ton per year potential emission exemption for graphic art systems applies to plantwide emissions, not to each printing line.

This advice, given to you in our telephone conversation in March, was based upon information included in the EPA document entitled "Guidance to State and Local Agencies in Preparing Regulations to Control Volatile Organic Compounds From Ten Stationary Source Categories," EPA-450/2-79-004, dated September 1979. I have enclosed pertinent sections of this document relative to the graphic arts 100-ton per year exemption.

In addition, I have enclosed copies of memorandum dated September 7, 1978, and August 8, 1980, that related to the determination of 100-ton/year facilities.

In view of the above, this will confirm that the 100-ton per year exemption for existing graphic arts facilities affected by the graphic arts control technical guideline, relates to plantwide emissions, not to each printing line.

It is hoped that this will meet your present need. Please contact me if I can be of further assistance.

Sincerely yours,

William L. Polglase
Environmental Engineer
Technical Guidance Section

Enclosures

cc: Doug Cook, Region IV

1. EPA-450/2-79-004 (Pertinent sections of this document relative to the graphic arts 100-ton per year exemption)

Date: September 1979

Title: Guidance to State and Local Agencies in Preparing Regulations to Control Volatile Organic Compounds from Ten Stationary Source Categories

2. Memorandum From: Richard G. Rhoads, Director, Control Programs Development Division

To: Director, Air and Hazardous Materials Division, Regions I, III-X Director, Environmental Programs Division, Region II

Date: September 7, 1978

Subject: Clarification of Degreasing Regulations Requirements

3. Memorandum From: G. T. Helms, Chief, Control Programs Operations Branch

To: John L. Hanisch, Mobile Source Emissions Section, Region I

Date: August 8, 1980

Subject: Request for Confirmation of the Definition of a 100-Ton Source as Applied to Controls in the Gasoline Storage and Marketing Chain