Texas Natural Resource Conservation Commission

INTEROFFICE MEMORANDUM

To: Interested Parties Date: October 2, 2000

From: Tammy Villarreal, Manager, Chemical & Coatings Section

Subject: Clarification of various emission threshold limits with respect to add-on

controls for operations referenced in the Technical Guidance Packages for

Coatings Sources - part II

This memo will serve as an addition (part II) to the November 12, 1998 memo regarding the above subject.

The purpose of this memo is to require that exempt solvents be included with the site-wide VOC emissions when determining the need for add-on controls. It has come to our attention that exempt solvents can contribute a significant amount of emissions beside VOC. Even though these (exempt solvents) carbon compounds have been excluded from the definition of VOC, they remain an air contaminant per TNRCC regulations. Add-on control technology such as oxidizers, carbon adsorption systems, etc. can be used to control these exempt solvents (especially exempt solvents that do not contain halogens) similarly to VOC emissions. Should a waste stream containing halogens be sent to a combustion device, additional control such as scrubbers can be used to control their by-products, such as acids.

Therefore, this memo replaces the pertinent section regarding the various emission threshold limits with respect to add-on controls for operations referenced in the Technical Guidance Packages for Coatings Sources.