

LAKE MICHIGAN AIR DIRECTORS
CONSORTIUM

2350 East Devon Avenue, Suite 242
Des Plaines, IL 60018
Phone: 708-296-2181
Fax: 708-296-2958

FILE COPY

July 20, 1993

David Kee
Director, Air and Radiation Division
USEPA, Region V (5 AR 18J)
Metcalf Federal Building
77 West Jackson Boulevard
Chicago, IL 60604

Dear Dave:

Pursuant to the Clean Air Act Amendments of 1990, the States of Illinois, Indiana, Michigan, and Wisconsin are required to submit a revision to their implementation plans to provide for volatile organic compound (VOC) emission reductions by 1996 of at least 15 percent from baseline emissions. The development of these "15 percent plans" has proven to be especially challenging. We have found that it will likely be necessary to adopt control measures beyond those mandated by the Act in order to meet the 15 percent target.

Among the mandatory measures assumed in three of our preliminary 15 percent plans are new reasonably available control technology (RACT) regulations for 13 new stationary source categories. Pursuant to Section 182(b)(2) of the Act, States are required to submit RACT regulations for each category of VOC sources in the area covered by a Control Techniques Guideline (CTG) document issued between the date of enactment of the Act and the applicable attainment date. These new CTGs are specified in Section 183 of the Act (i.e., USEPA is required to adopt CTGs for 13 categories of stationary sources by November 1993). A list of these source categories is provided in the enclosure.

Unfortunately, the delay in adopting these CTGs has presented some potential problems for us in preparing our 15 percent plans. We believe that it would not be efficient or appropriate for any of the States to adopt independently RACT rules prior to the issuance of the Federal CTGs. The difficulty in finding creditable short-term emission reductions to meet the 15 percent target, however, necessitates in most cases that we rely on all mandatory measures, including new RACT rules for these 13 categories. We, therefore, intend to assume credit, as necessary, for these forthcoming rules, as well as commit to adopting the necessary RACT rules.

If you have any questions concerning this letter, please contact Stephen Gerritson, Executive Director, Lake Michigan Air Directors Consortium at 708-296-2181.

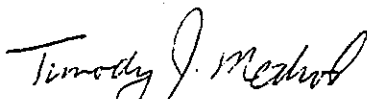
Sincerely,



Bharat Mathur, Chief
Bureau of Air
Illinois EPA



Donald Theiler, Director
Bureau of Air Management
Wisconsin DNR



Tim Method, Asst. Commissioner
Office of Air Management
Indiana DEM



Dennis Drake, Director
Air Quality Division
Michigan DNR

Enclosure

ENCLOSURE

NEW CTG PROJECTS & SCHEDULES

CTG / SOURCE		DRAFT	FINAL
1	SOCMI Distillation	12/91	12/92
2	SOCMI Reactors	12/91	12/92
3	Wood Furniture	9/92	11/93
4	Plastic Parts: Business Machines	9/92	11/93
5	Plastic Parts: Other	9/92	11/93
6	Offset Lithography	9/92	11/93
7	Industrial Wastewater	9/92	11/93
8	Autobody Refinishing	9/92	11/93
9	SOCMI Batch Processing	9/92	11/93
10	VOL Storage Tanks	7/92	7/93
11	Cleanup Solvents	9/92	11/93
12	Aerospace Coatings	9/92	11/93
13	Ship Building & Repair	9/92	11/93