MEMORANDUM

SUBJECT: Reynolds and Westvaco Plant Proposed Ozone (O_3)
           State Implementation Plan (SIP) Revisions

FROM: G. T. Helms, Chief
           Control Programs Operating Branch, CPOB (MD-15)

TO: Ray Cunningham, Director
           Air Management Division, Region III

     As requested, the proposed SIP revisions for the Reynolds and
Westvaco plants located in Richmond, Virginia, have been reviewed and
our comments follow.

General

     With respect to the two above noted SIP revisions, it is our
opinion that no fourth delay in taking action on the proposal is
warranted. We recommend that in both cases, the SIP revisions be
disapproved. The bases for this recommendation are:

     1) Considering the information available to us, the emission
limits adopted by the state do not appear to reflect reasonably
available control technology (RACT).

     2) The January 20, 1984 policy memorandum dealing with volatile
organic compound (VOC) averaging times lists specific criteria for
approval of VOC SIP revisions. This policy was a restatement of past
guidance which has been issued for some time before. These two
actions appear to vary with agency policy. Specifically, no
persuasive justification is presented showing that the very long
averaging times are needed, other than as a substitute for installing
controls.

     3) Both packages involve a number of unsolved policy issues
presently under agency review. In particular, credit for shutdown and
offsets in nonattainment areas are of concern. A final determination
of the applicability of their policy to the Westvaco and Reynolds
situation cannot be made until agency policy is issued.

A. Specific comments related to the Reynolds SIP revision are as
follows:

     1) The SIP revision submission lacks sufficient information on
the combined plants involved to determine if the technology being
applied represents RACT. There is insufficient detail to determine if
some of the lines are applying coatings rather than painting. Also,
the calculations of control effectiveness are not adequately

explained. Finally, the evaluation of applicability of lowest
achievable emission rate (LAER) or the new press which is replacing
the shutdown lines is not discussed. Staff from ESED are exploring
the issues with the firm and will advise you o f their findings in a
subsequent memorandum.

2) Since the emission limits are expressed as a total tonnage
limit based on full production, it would appear that the only time
that the firm would have to be concerned with a level close to RACT is
when the plants are operating at full production. It would further
appear that the State limit allows the company to take credit for
downtime and nonproduction time, which is inconsistent with Agency
policy (January 20, 1984 policy).

B. Specific comments with regard to the Westvaco SIP revision are as
follows:

1) It appears that the control system proposed for the old plant
would be RACT if the control equipment (carbon absorption) were
properly constructed, operated and maintained. However, the State
emission limits are considerably less stringent than the capabilities
demonstrated for the facility and do not reflect RACT.

2) Subsequent test data submitted by the company for their new
plant indicate that the control equipment operates with an annual 79.9
percent efficiency. The data further indicate that with the exception
of two minor excursions (which may be artifacts of the data collection
procedures rather than losses in control efficiency), the control
equipment has operated for a year with a weekly average of no less
than 65 percent efficiency. This is considerably more effective than
required by the SIP revision. It is particularly important that the
adopted limits reflect RACT because "excess reduction beyond RACT" can
be used to reduce the amount of emission reductions achieved by other
resources.

It is hoped that these comments will be helpful to you. If you
have any questions please contact me or John Calcagni (on VOC RACT
issues) or Brock Nicholson (on emission trading issues).