

A recent change in the definition of VOC regarding t-butyl acetate (TBAC) will affect permitting, inventory, and modeling activities.

The 11/29/2004 Federal Register had a notice for the final rule to revise the definition of VOC to exclude TBAC. However, this rule also added a paragraph to the definition of VOC that requires TBAC to be reported as a separate entity for record keeping, emissions reporting, emissions inventory, and photochemical dispersion modeling, even though it is not considered VOC for emission limits or VOC content requirements. The paragraph added reads:

51.000 (s)(5) The following compound(s) are VOC for purposes of all record keeping, emissions reporting, photochemical dispersion modeling and inventory requirements which apply to VOC and shall be uniquely identified in emission reports, but are not VOC for purposes of VOC emissions limitations or VOC content requirements: t-butyl acetate.

The notice also states that for emissions inventories TBAC should be subtracted from the VOC total and listed separately. The earliest it would be effective would be August 24, 2005, so facilities would not be required to report it on their 2004 inventories, but would be required at a minimum to start reporting TBAC for the last few months of 2005 and so on. This will also effect permitting because TBAC is not to be considered as VOC when setting or complying with emission limits. EPA indicates that another issue may be that facilities will switch from using toluene and xylene to TBAC. Also, TBAC is not a HAP, so facilities won't have to pay Title V fees on it and will have to be careful not to double-count.