

P-UPV2A

May 10, 1971

Mr. Daniel Ring
National Paint, Varnish and Lacquer Association
1500 Rhode Island Avenue, N.W.
Washington, D.C. 20005

Dear Dan:

Attached are my comments on the letter sent to EPA on April 28, 1971. In addition I made some calculations to show the lack of correlation found in the graph in Appendix J. This could be used as supporting data for item (9) of the April 28 letter:

According to the graph in Appendix J, an oxidant level of 0.15 ppm., for example, requires a reduction in hydrocarbon level by 50%, from 0.5 ppm. to 0.25 ppm. If the correlation is valid, most of the time, an oxidant level of less than 0.15 ppm. would have a corresponding hydrocarbon level of less than 0.5 ppm. Likewise, an oxidant level of more than 0.15 ppm. would have a corresponding hydrocarbon level of more than 0.5 ppm.

The "Air Quality Criteria for Hydrocarbons," Figure 5-3, pg. 5-9, does not support this correlation. Of 133 measured values, 16 have oxidant values greater than 0.15 ppm. The corresponding non-methane hydrocarbon values range from 0.5-2.4 ppm. More importantly, 117 oxidant concentrations have values less than 0.15 ppm. with corresponding non-methane hydrocarbon values ranging from 0.3-2.4 ppm. If the correlation in Appendix J actually did exist, most of these hydrocarbon values would be less than 0.5 ppm. In reality, only 21 of the 117 measurements (18%) have values of 0.5 ppm. or less of non-methane hydrocarbon. The justification for a real correlation in Appendix J is tenuous at best.

Sincerely,

William W. Miller
Pollution Control Coordinator

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