Notice

This Engineering Guide was recently converted to a PC format and it has not been proof read by our engineering staff. Therefore, it is subject to change at a later date.

Ohio EPA

Division of Air Pollution Control

Engineering Section

Engineering Guide #39

Question:

If a source which employs organic compounds [as defined in paragraph (B)(3) of OAC rule 3745-21-01] is converted to exempt materials such as methyl chloroform, methylene chloride or trichlorotrifluoroethane, can the resulting reduction of the emissions of regulated organic compounds be used as an offset for organic compound emissions from a new source or another existing source as part of a "bubble concept"? (This question was originated by the Engineering Section of the Division of Air Pollution Control).

Answer:

OAC Chapter 3745-21 regulates the emissions of organic compounds which are precursors to the formation of ozone. The definition of organic compound in paragraph (B)(3) or OAC rule 3745-21-01 specifically excludes those compounds which do not contribute to the formation of ozone. The exempt organic compound include 1, 1, 1-trichloroethane (methyl chloroform), methylene chloride and trichlorotrifluoroethane. Therefore, if a source converts from regulated organic compounds to exempt materials, the conversion has a beneficial air quality impact in terms of ozone formation; and a legitimate emission reduction credit is created which may be used to offset emissions from a new source or from another existing source as part of a "bubble concept".

The USEPA's emission trading policy should be carefully followed in calculating the emission reduction credits (lbs/day and/or tons/year) which may be used in any particular case to offset emissions from a new source or from another existing source as part of a "bubble concept".

Also, when such an emission reduction credit is determined to be acceptable, the owner/operator of the source should be advised that the use of the exempt materials may be regulated in the future for reasons which are not related to the formation of ozone.

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