

MEMORANDUM

DATE: November 10, 2004

SUBJECT: Summary of September 24, 2003 EPA Information Exchange Forum

FROM: Heather P. Brown, EC/R Incorporated

TO: Ingrid A. Ward, EPA:PIRG

I. INTRODUCTION

On September 24, 2003, the Office of Air Quality Planning and Standards (OAQPS) held an Information Exchange Forum for the Paper and Other Web Coating (POWC) industry. The purpose of the 2003 forum was to finalize five implementation tools developed for the POWC maximum achievable control technology (MACT) standards.

II. PLACE AND DATE

US EPA
Building C
Research Triangle Park, North Carolina

September 24, 2003
9:30 a.m. to 2:30 p.m.

III. PARTICIPANTS

A list of meeting participants is shown in Table 1.

IV. MEETING SUMMARY

Welcome

The meeting opened with a brief welcome from Ms. Ingrid Ward, with the Program Implementation and Review Group (PIRG). After brief introductions of the meeting attendees, Ms. Ward reviewed the meeting agenda and presented the meeting materials contained in the binders provided to all attendees. The binders contained the following items:

1. Meeting Agenda
2. List of Attendees
3. POWC Implementation Tool Development Plan

**Table 1. 2003 POWC Information Exchange Forum
Meeting Attendees
Research Triangle Park, NC
September 24, 2003**

	Last Name	First Name	Affiliation	Phone Number	Email Address
1	Almodovar	Paul	EPA/OAQPS/ESD/CCPG	919-541-0283	almodovar.paul@epamail.epa.gov
2	Brown	Heather	EC/R Incorporated	919-484-0222	brown.heatherlynn@ecrweb.com
3	Ellison	Dave	Pechiney	920-727-6027	david.ellison@pechiney.com
4	Hillstrom	Jim	Glenroy, Inc	262-250-7227	jimh@glenroy.com
5	Hofmeister	Howard	Bemis Flexible Packaging	920-303-7417	hghofmeister@bemis.com
6	Jones	Gary	Graphics Arts Technical Foundation	412-741-6860 x608	GaryJGATF@aol.com
7	Jones	Randy	Sealed Air, Cryovac Division	864-433-2334	randy.jones@sealedair.com
8	Kinter	Marcia	Screenprinting Graphic Imaging Association International	703-385-1335	marcik@sgia.org
9	Miller	Susan	Clayton Group	919-468-0135	SMiller@claytongrp.com
10	Painter	Dave	EPA/OAQPS/ITPID/PIRG	919-541-5515	painter.david@epa.gov
11	Pederson	Mark	Rollprint Packaging Products	630-628-1700 x3322	mpederson@rollpring.com
12	Rach	Steve	MEGTEC Systems	920-337-2789	srach@megtec.com

**Table 1. 2003 POWC Information Exchange Forum
Meeting Attendees
Research Triangle Park, NC
September 24, 2003**

	Last Name	First Name	Affiliation	Phone Number	Email Address
13	Singhal	Ram	Flexible Packaging Association	410-694-0823	rsinghal@flexpack.org
14	Ward	Ingrid	EPA/OAQPS/ITPID/PIRG	919-541-0300	Ward.ingrid@epamail.epa.gov
15	Williams	Dan	Sealed Air, Cryovac Division	864-433-3167	dan.h.williams@sealedair.com
16	Wood	Gil	EPA/OAQPS/ITPID/PIRG	919-541-5272	wood.gil@epa.gov
17	Yount	David	RJR Packaging	336-741-6309	yountd@rjrt.com

4. Review Process Materials
5. Final Tools
6. Tools to be Finalized During Information Exchange
7. Tools Available for Review
8. Federal Register Notice containing the Preamble and Final Rule

Comments on Final Tools

The following is a summary of the discussion on the final tools.

Questions and Answers (Q&A) Document

Mr. Gary Jones, with the Graphic Arts Technical Foundation (GATF), stated that GATF had submitted a question with a draft answer for the Q&A document and wanted to know whether it would be included in a future Q&A document. Ms. Ward responded that the question had come in after the 18 Q&A's had been reviewed and that it was in the next batch of Q&A's to be processed. Mr. Jones provided a draft of the question and possible answer (see Attachment 1).

SIC Codes

Mr. Jones (GATF) commented that SIC 2761 (Manifold Business Forms) should not be included in the list of SIC for the POWC industry. The processes listed under this SIC use printed lithography and are not subject to subpart JJJJ.

Potentially Affected Source List

Several attendees indicated that they thought that the potentially affected source list was not going to be included as a POWC implementation tool and that using the Toxics Release Inventory (TRI) would be referenced on the implementation tools website as a more up-to-date list of sources.

Ms. Ward and Mr. Gil Wood (also with PIRG) indicated that this source list was important to State and Regional offices as a starting point for identifying potentially affected sources. However, given the concerns by industry about the potentially affected source list being on the Internet, Ms. Ward proposed the following:

- Remove the list from the Internet and sending an email to Regional offices with the list and indicating that the list is outdated but is being provided for informational purposes.
- Place the following statement on the Internet:
"A list of affected sources is not available. We recommend that use the TRI reporting data above to compile any potentially affected source lists that you may need. A list of sources that provided input into the rule development process is available upon request. The list is outdated and

should not be used for compliance assurance or other regulatory enforcement purposes. The list identifies 185 facilities that engage in paper and other web surface coating activities. The preamble to Subpart JJJJ (67 FR 72331, 12/4/03) estimates that there are 400 existing paper and other web facilities and that 203 of those facilities are major sources. This source list was developed during the rule development process and may be outdated. The list does not identify all potentially affected sources. This list also contains facilities that are both area and major sources. Area sources are not subject to Subpart JJJJ. For further information, please contact Ingrid Ward.”

- Reference the TRI database for a more recent list
- Change the name of the list to “Facilities that Participated in Rule Development”
- Reference the Background Information Document

Tools to be Finalized During Information Exchange Forum

The goal of the forum was to finalize the implementation tools that had been submitted for review. The organization responsible for each implementation tool presented their product and discussed how comments received prior to the forum had been addressed. Additional comments from the group were also provided and discussed. For each implementation tool, the result of the discussion was a consensus on how to address the comments. Ms. Ward requested that the comments be addressed and the final tools resubmitted by the end of October. Table 2 presents the implementation tools and responsible organization.

Table 2. Implementation Tools to be Finalized during Information Exchange Forum

Implementation Tool	Lead
Initial Notification	FPA
Executive Summary	PSTC
Compliance Options Flow Diagram	FPA
Example Semiannual Report Forms	FPA

Initial Notification

The Example Initial Notification form was developed by FPA. Comments from the State of New York, EPA (OAQPS), and GATF had been addressed prior to the forum. The only comment received during the forum was related to how to address ensure that area sources and major sources with no affected sources

would understand that this initial notification form need not be submitted. During the forum, FPA agreed to the following:

- Move Item3, Section D of the form and include within Item 2.
- Add a caveat to Item 2 of the form indicating that the form does not have to be submitted but must be maintained onsite if the facility is an area source or a major source with no affected sources and reference ' 63.10(b)(3).

Executive Summary

The Executive Summary was developed by PSTC. Comments from The State of New York, FPA, and GATF had been addressed prior to the forum. The following is a summary of the changes that PSTC agreed to make during the forum.

General. All references to pressure sensitive tape (PST) and PSTC would be removed from the presentation. Page numbers will also be added to the presentation. Regulatory citations will be added as footnotes as applicable.

Slide 3. This slide had been deleted from the Executive Summary. The slide will be added back into the presentation and made more generic. The title of the slide will be renamed "Typical HAP in the Coating Industry." PSTC requested that any one provide additional HAP that should be added to the list.

Slide 5. The Key Dates will be updated to agree with the promulgated rule and the initial notification will be added.

Slide 6. References to lithographic printing, etc. will be added.

Slide 7. The third bullet will be revised as follows: "P&OWC affiliated equipment is specifically..."

Slide 8. This slide will be separated into two slides, one slide for existing source requirements and one for new source requirements and a summary of the provision for using combined compliance options will be added. In addition, the units will be changed kg/kg to be consistent with the rule.

Slide 9. Under the first bullet, a third sub-bullet will be added for meeting the limits on a per coating basis.

Slide 10. The first bullet will be modified to indicate that it applies only if averaging coatings. The fourth bullet on the slide will be deleted.

Slide 11. References to HAP will be changed to VOC. The third bullet will be modified to indicate that HAP is based on the percent VOC recovered. The fourth bullet will also be clarified.

Slide 14. A footnote will be added to indicate that the percent reduction of VOC is assumed to equate to HAP. Under the second bullet, a second sub-bullet will be added for parametric monitoring.

Slide 17. This slide has been deleted.

Slide 18. This slide will be deleted because it is based on deleted Slide 17.

Slide 19. The word violation will be replaced with the word deviation in the second sub-bullet.

Slide 22. This slide will be deleted.

Compliance Options Flow Diagram

The Compliance Options Flow Diagram was developed by FPA. Comments were submitted by EPA. Because significant number of changes will be made as a result of the comments, FPA will revised the flow diagram and resubmit for additional review.

Example Semiannual Report Forms

The Semiannual Report Forms were developed by FPA. Comments were submitted to EPA via email from the New York State Department of Environmental Conservation and GATF. Some of these comments were addressed prior to the meeting. The following is a summary of changes agreed upon during the meeting:

- Change the section entitled “Exceedances of Criteria” to “Deviation of Criteria” and to center the heading and remove the colon.
- Add a line for the section now entitled “Deviation of Criteria” where the user would indicate “None” or be instructed to complete the remainder of the section.
- Add an identifier at the top of the page indicating that the form should be used for existing sources.

Partner Recognition

After a short lunch break, Mr. Bob Kellam, Associate Director of the Information Transfer and Program Integration Division spoke about the partnership and how well the implementation tool development process had gone.

Mr. Ray Vogel, on the Activities Promotion Team provided some feedback on the process. He recommended that there should be a way for OAQPS to disseminate information about ongoing activities. Mr. Vogel recommended a calendar of events or a list serve.

Ms. Ward then passed out certificates to the partners to show her appreciation for their efforts in developing the implementation tools.

Upcoming Activities

Ms. Ward had the following reminders:

- An email will be sent out the next week and once the tools were distributed, the 30-day comment period would begin.
- The next partner conference call is set for November 6th.
- Please send in Q&A's as they arise.

Conclusions

To end the meeting, Ms. Ward asked if there were any final questions. Concerns were brought up regarding overlap with the Boiler, Fabric, and Site Remediation MACT standards. Furthermore, a request for guidance regarding the applicability overlap issues with the Printing and Publishing MACT standard.

Attachment 1

**Draft Question and Potential Answer
Submitted by GATF**

Memorandum
March 30,2003

To: Ingrid Ward

From: Gary Jones and Marci Kinter

Re: Proposed Q & A On Litho, Screen, and Narrow Web Applicability

Per our correspondence, we would like to see a question and corresponding answer added to the Q & A document addressing the applicability of the rule to lithographic, screen printing, and narrow web flexographic operations. Therefore, the following Q &A is proposed for consideration:

Q: Does the POWC rule apply to lithographic, screen printing, and narrow web flexographic operations?

A: No, according to Section 63.3300 (c) web coating in lithography, screen printing, letterpress, and narrow web flexographic printing processes as defined in 63.822 (a) are exempt from the rule.