

To: George Smith
Project File

Date: April 19, 1999

Re: Summary Minutes from Metal Can Industry Meeting Held on April 7, 1999

A copy of the sign-in sheet is included as Appendix A.

A copy of the meeting agenda is included as Appendix B.

Mr. George Smith initiated the meeting, reviewed the agenda, and asked everyone to introduce themselves and their affiliation. Mr. Steve Pearson then concurred with the agenda items and allotted times and turned the meeting over to Ms. Sueanne Pfifferling of IT Corporation to do their presentation of the database summary completed thus far. Mr. Nick Chada, also of IT Corporation assisted with some parts of the presentation. A copy of their presentation is included as Appendix C.

Mr. Dave Reeves of MRI presented EPA's summary of the database and a copy of his presentation is included as Appendix D.

Mr. Smith provided a revised schedule for the project and a copy is included as Appendix E.

The following bullets summarize the issues and discussion during and after both of the database presentations. These are in no particular order or priority:

- Small business issues need to be understood so economic impacts can be evaluated. EPA requested any additional information that industry could supply on small businesses.

- One industry representative stated that he did not provide coatings information on the powder coatings they use since they contain no HAP and generate no HAP emissions. EPA requested that he send that information to MRI as soon as possible.

- Some can lines only involve assembly of the container (can) and no coatings are involved. EPA

provided the values from their Title V operating permit, some companies used performance test data, and others used best engineering judgement. Some of the permit numbers are old values from several years ago and were not updated even as the control equipment aged and the capture and destruction efficiencies decreased. Current actual efficiencies are probably 5 to 10 percent lower than the permit numbers, but no new tests have been run to determine better values.

- Industry requested several types of floor options be considered and evaluated in hopes of the NESHAP providing flexibility in terms of the final compliance options.

– Based on the ICR responses, there are several secondary emission points/sources within the metal can manufacturing processes. EPA requested industry document why such emission points have very small emissions associated with them and what existing rules and requirements are in place and cover such emission points.

– When asked what reasons there are for installing existing add-on control devices, industry representatives stated: odor control, OSHA requirements and employee safety/comfort issues, VOC limits (RACT/LAER), and PSD/NSR issues.

– Industry was comfortable dealing in terms of mass (lbs) of HAP per volume (gallons) of solids.

– No new metal can manufacturing plants are expected to be built in the next several years. Industry representatives stated that consolidation of existing facilities is likely with any significant control requirements resulting from the upcoming NESHAP.

– There was a lot of discussion about EPA's NESHAP policy of "once in, always in." With the possible delisting of the two-piece beverage can industry segment, the question was asked: if the delisting is granted after the NESHAP is promulgated, would the "once in, always in" policy still be followed?

– After the average HAP contents of the various coating types were presented, the coating suppliers were asked if the data were realistic in their view. EPA requested that they follow-up with their documented comments after they reviewed their own data for their coatings.

and if the weighted average includes basecoats, the coating limits could be skewed inappropriately for those facilities not using basecoats.

– There was concern with potential overlapping coating NESHAP projects. Metal coil, miscellaneous metal parts, and lithography were mentioned and some metal can facilities use or make products falling under these source categories. Metal pails were also mentioned as an area where clear delineation is needed.

– Special or unique process steps mentioned by industry: video jet (date stamping) inks; paste or coating overspray drying (bake) ovens, and coating “dots” that change color when cooked to show that the can contents have been cooked.

– Industry representatives from companies making general line cans commented that a given line may be coating several different types of cans on any given day. Little or no tooling changes are needed for the equipment and in many cases, coating specifications are changed by the client at the last minute. Planning production runs and coating types is not always a luxury they are afforded by their clients.

– The issue of de minimis coating and solvent limits was discussed. Industry mentioned issues such as R & D, trial runs, and high HAP content/low usage coatings. Some states have cutoff limits ranging from 2 pounds per hour (CA) to 200 pounds of individual HAP per year (PA).

– Formaldehyde emissions generated during the coating curing process (e.g., cure volatiles) were discussed, as well as formaldehyde emissions generated as a product of combustion, or more specifically, incomplete combustion. Some individual companies provided data from recent performance testing and EPA requested any additional data be submitted on this issue. EPA also stated that cure volatiles are not unique to metal can coatings and that this issue is being evaluated on other current projects.