

Date: June 15, 1999

Subject: Summary Minutes from Metal Can Industry Meeting Held on June 10, 1999

From: Dave Reeves

To: George Smith  
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A copy of the meeting agenda is included as Appendix A.

Mr. George Smith initiated the meeting, reviewed the agenda, and asked everyone to introduce themselves and their affiliation. (See Appendix B for a copy of the sign in sheet listing all of the attendees and call-in participants.) Everyone concurred with the agenda items and allotted times and no new items were brought up for additional discussion. Mr. Smith reviewed the project schedule that was handed out and discussed at the last meeting and indicated that the project is still on schedule.

Mr. Dave Reeves of MRI presented EPA's summary of the Metal Can (Surface Coating) MACT Floor Analysis, and a copy of his presentation is included as Appendix C. During his presentation, Mr. Reeves pointed out updated information and provided new data on some of the slides (e.g., slides 2, 5, and 17). The presentation materials included as Attachment C contain the updated information discussed during the meeting.

Mr. Steve Pearson of the Can Manufacturers Institute, CMI, asked that questions be held until after completion of both presentations and then turned the meeting over to Ms. Suanne Pfifferling of IT Corporation to do their presentation of their MACT Floor analysis. Mr. Nick Chada, also of IT Corporation, assisted with some parts of the presentation. A copy of their presentation is included as Appendix D.

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

The variability in control device capture/control efficiencies reported in the ICR responses was discussed from the last meeting. Companies and facilities provided updated or revised numbers to IT Corporation which were then used in their floor calculations. Mr. Smith asked that the company or facility send a letter to EPA stating the new values so the project docket and database could properly reflect the updated information and be included in the next round of floor calculations.

Representatives from the companies manufacturing and coating two-piece beverage cans had concerns about the achievability of the MACT floors. They asked what more can be done or expected beyond their efforts to switch to low-VOC waterborne coatings; installing capture devices on those emission points where most of the VOC and HAP is generated; and routing those emissions to a control device. They do not believe it would be justified to require any additional capture equipment to get the last 10 to 20 percent of fugitive emissions and that the additional air flow requirements would likely result in several more control devices (e.g., thermal oxidizers) to handle

more air at a much lower VOC/VOHAP concentration. They also had concerns about the analysis being driven by sheet coating operations.

The biggest issue the industry representatives had with the single number (overall facility limit(s) approach) for the entire industry was the variability of coating requirements for all the different products made by the industry. The coatings used by the beverage can industry, while similar in some applications, cannot be used for all food can requirements. Waterborne coatings are predominant in the beverage can operations and most food can coatings are solventborne. If a HAP limit specific to a given facility or group of facilities, some product types will not be represented and facilities producing those products may not be able to use the lower-HAP coatings.

Ms. Pfifferling stated that several facilities have closed or changed product lines or mixes since the industry responded to the ICR. She provided a list of the plant closings and changes reported by metal can companies.

Mr. Reeves asked if the industry representatives were comfortable with an overall facility limit(s) approach. There were no questions or issues raised and the representatives stated they were comfortable dealing in terms of mass (pounds) of HAP per volume (gallons) of solids.

There was a follow-up discussion concerning EPA's NESHAP policy of "once in, always in." Ms. Koman indicated that the Agency was discussing the policy and would provide an update once/if any decision or change in the guidance is made.

Mr. Dennis Cornish from Silgan Corporation commented on using the cure HAP emission factor from the two-piece beverage segment and applying it across the board to all coatings used at all the different can segments. He stated that there is a significant difference between the coatings used by the food industry and the beverage industry.

The inclusion of cure HAP (formaldehyde emissions generated during the coating curing process) was a new issue for the industry and they said they would review the data closely and provide comments once they had a chance to discuss internally.

The afternoon session was comprised of several presentations from EPA staff from other groups. The first presentation was made by Mr. Scott Mathias and Mr. Tyler Fox from the Innovative Strategies and Economics Group (ISEG). Mr. Mathias provided a handout (included as Attachment E) and discussed the difference between the technical costs to comply with the NESHAP and the economic impacts to the affected industry. Industry representatives commented that their industry was not able to pass any cost impacts on to their clients. They also committed to providing additional economic data to EPA:ISEG through CMI.

The next presentations were made by Ms. Kelly Rimer and Mr. Ted Palma from EPA's Risk Exposure and Assessment Group (REAG). Ms. Rimer provided an update on the status of the delisting petition submitted by CMI for the two-piece beer and beverage industry segment. Ms. Rimer stated that the petition is considered complete and that REAG was actively evaluating the various issues associated with the petition. There will be a Federal Register notice published in the coming weeks stating the petition is complete and asking for public comments.

The last presentation was made by Mr. Gary McAlister from EPA's Emission Measurement and Analysis Division (EMAD) Source Measurement Analysis Group. Mr. McAlister provided copies of a preliminary draft "Method for the Measurement of Cure Volatiles in Paints and Coatings" which is included as Attachment F. Most of the discussion concerning the draft test method involved the design parameters: oven temperature and cure time. Industry representatives stated that typical cure times are on the order of 1 minute and that there might be two or three cure cycles with different coatings. They did not feel that the 30 minute cure time described in the test method was representative and would show the cure emissions to be higher than what actually occurs. Mr. McAlister asked for any test data related to cure emissions from the metal can coating suppliers and encouraged everyone to review the draft method and comment on its merits and/or issues.

The meeting was concluded by Mr. Smith and he indicated that the Agency would carefully consider the information and issues discussed at the meeting. He then stated he felt another meeting would be helpful to review/discuss final floors and to provide additional data for the issues raised during the meeting. Mr. Pearson and the industry stakeholders suggested July 21, 1999 as an available date for the next meeting.