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April 8, 1980

Mr. Dennis Crumpler
U.S. Environmental Protection Agency
Office of Air Quality & Standards
Research Triangle Park, NC 27711

Dear Dennis:

We now have the results of the VOC usage survey ATMI conducted and we would like to share them with you.

We had 35 companies respond representing both roller and screen printing operations and representing over 50% of 1979 woven fabric production for both types of machines. All data is for the 1979 calendar year.

1979 woven fabric printed: 1,743,006 thousand yards.
Fabric printed in 1979 by respondees: 905,729 thousand yards.
Roller print machines reported in 1980 ATMI survey: 169
Roller print machines operated by VOC respondees: 107
Screen print machines reported in 1980 ATMI survey: 178
Screen print machines operated by VOC survey respondees: 121

We believe our VOC usage survey has an excellent data base and is representative of the textile printing industry with one exception. It appears that most printers which do not use solvents in their print pastes did not respond. In other words, this data covers primarily the portion of our industry that uses solvent resulting in higher industry solvent usage, on an across the board basis, than is actually the case.

Pounds of VOC (mineral
spirits) used in 1979
(thousands)

Pounds of fabric printed
(thousands)

Linear Yards printed
(thousands)

Pounds of VOC per
thousand pounds of fabric

	Roller Machines	Screen Machines
Pounds of VOC (mineral spirits) used in 1979 (thousands)	16,190	5,719
Pounds of fabric printed (thousands)	114,140	249,988
Linear Yards printed (thousands)	403,760	501,169
Pounds of VOC per thousand pounds of fabric	142	23

Our questionnaire requested pounds, width and yards of fabric run with solvent-based print pastes, but only yards of fabric run with print pastes containing no solvents. Therefore, the "pounds of fabric printed" figures include an estimate based on the same weight per yard as the fabric printed with solvent-based paste. This estimate is most likely lower than actual pounds, resulting in a higher pounds of VOC per thousand pounds of fabric.

ATMI believes that this data is by far the best available because it reflects actual usage over a full year period and because it uses more than half the industry as its data base.

It proves that the Phase I emission factors of 350 and 35 pounds of VOC per thousand pounds of fabric for roller and screen systems respectively, are grossly overstated and it diminishes the potential reduction in VOC's achievable via a standard for this segment of the industry to the point that we truly question the value of promulgating such a standard.

We look forward to your response.

Sincerely,



William H. Steenland
Assistant Director
Market Division

WHS/crs