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Category: 52 – Type of Compliance Monitoring When Incineration is Used

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

10 OCT 1978

Mr. Malcolm D. MacArthur
Lee, Toomey & Kent
1200 Eighteenth Street, N. W.
Washington, D. C. 20036

Dear Mr. MacArthur:

This is in response to your letter of September 7, 1978, in which you question the availability of control technology applicable to the flexible packaging industry. I assume that you are referring to past comments by the National Flexible Packaging Association (NFPA) as to the availability, workability, and cost of incineration for the converting industry. While repeated references have been made to the problems of a specific manufacturer with a specific afterburner, little information has been provided on the more general question of control for the industry. As you may know, there are paper coaters using rotogravure equipment nearly identical to that of converters. These paper coaters have used incinerators and carbon adsorbers for a number of years and have remained competitive in their markets. It appears your industry could take similar measures on its rotogravure machines. Further, there is no obvious reason why emissions from the flexographic equipment would be treated differently.

Our engineering staff has visited two plants recommended by the NFPA as being broadly representative of the several processes used by the industry. In general, organic emissions from both the rotogravure and flexographic machines were well contained and efficiently moved outside the buildings from the machines. The organic concentrations of these streams reportedly range from 3 to 20 percent of the lower explosive limit (LEL). This is in the concentration range of many streams which are now successfully destroyed or reclaimed (depending on the circumstances) by air pollution control equipment which has long been available. As a consequence, we feel that availability of the necessary technology to control air pollution from your industry is not a matter of conjecture - it is being used for similar exhaust streams in a great many plants in industries around the world.

Since the availability of technology is not questionable, any decision on its reasonableness must be based on cost and affordability. It would be helpful if you provided information on the annualized cost of operating various control devices in your industry and cost per ton of VOC controlled.

The paper coating control techniques guidelines (CTG) apply to those operations in which coatings are distributed uniformly across the web. In contrast, the graphic arts or printing CTG will apply to processes in which the coating is not uniform across the web. Our investigations indicate that the same emission limit (2.9 lbs per gallon of coating) represents reasonably available control technology for both operations. Thus, the only real difference in control requirements will be the somewhat earlier compliance date for paper coating. Since the manufacture of flexible packaging involves both full web coating (paper coating) and printing, an interpretation of CTG applicability is necessary.

Where both coating and printing are performed on the same machine, we conclude that the graphic arts or printing CTG should apply. An operator will not be faced with two different compliance dates for the same equipment. On the other hand, paper coating operations including lamination or coating of flexible packaging stock where no printing is performed should be subject to paper coating requirements of State Implementation Plans (SIP's). From our understanding of the industry and from your statements, this would mean that paper coating regulations with their earlier compliance dates will apply only to a small portion of the flexible packaging industry. This timing will provide an opportunity for plant personnel to familiarize themselves with control technology well in advance of compliance dates for printing operations. I plan to advise State air pollution control agencies of our decision in this matter.

We look forward to receiving results of the WAPORA survey and appreciate your cooperation in compiling the information.

Sincerely yours,

Walter C. Barber
Director
Office of Air Quality Planning
and Standards