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

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SUBJECT: Applicability of Paper Coating, Fabric Coating, and Graphic Arts
CTGs

FROM: Tom Helms, Chief (MD-15)
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TO: Air Branch Chief, Regions I - X

Recent discussions with State agencies and industry indicate there are misunderstandings concerning which coating processes are subject to the Graphic Arts CTG (Volume VIII) and which are covered by the Paper Coating and Fabric Coating CTGs (Volume II).

As stated in Section 1.2.4 of Volume VIII, the Graphic Arts CTG is intended to cover printing operations in the production of packaging materials and publication rotogravure printing operations. Other types of web coating operations are covered by Volume II in the Paper Coating and Fabric Coating CTGs. These Volume II operations include some printing operations, such as printing of wallpaper, floor coverings, gift wrap, shower curtains, and artificial leather and wood grains.

Industry spokesmen have requested that all rotogravure printing operations be covered under the Graphic Arts CTG (Volume VIII). There is a certain simplicity to having all rotogravure printing operations included under one RACT level; however, since publication printing and flexible package printing would be included, such a general rotogravure RACT level would, of necessity, be less strict than the paper coating and fabric coating RACT levels described in Volume II.

EPA engineers have observed that there are many rotogravure coating operations which are as amenable to control as are paper and fabric coated by reverse roll or blade coating techniques. Thus, in order to obtain the maximum reasonable control, rotogravure operations (other than publication printing and flexible packaging printing) have been included in the Paper Coating and Fabric Coating CTGs along with roll, reverse roll, blades, air knife, and other coating application techniques.

Some types of printing, such as textile printing, are not covered by either Volume II or Volume VIII, but may be covered in future CTGs.

cc: VOC Contact, Regions I – X
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