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Category: 16 – Surface Coating of Miscellaneous Metal Parts and Product

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

DATE: September 3, 1980

SUBJECT: Miscellaneous Metal Parts and Products CTG
Emission Limits for Coating of Shipping Pails & Drums

FROM: Tom Helms, Chief
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TO: Air Branch Chief, Regions I-X

The sample regulation for Group II CTG categories indicated that the coating of pails and drums was to be included in the Miscellaneous Metal Parts CTG. Representatives from the shipping container industry have since requested clarification as to what emission limits are applicable to their coatings.

We recommend that a presumptive norm of 4.3 pounds of VOC per gallon of coating less water is reasonably available control technology for coatings used in pail and drum interior protective linings even though the coatings may not be a true "clear coat". This determination was made on the basis of the unavailability of lower VOC coatings that can withstand the harsh, toxic, and corrosive nature of many chemicals that are shipped in these containers.

The exterior coatings for pails and drums must meet an emission limit of 3.5 pounds of VOC per gallon of coating less water. This is the limit described in the CTG for outdoor exposure coatings.

The following information is provided for the States to use in defining metal pails and drums:

Pails – any nominal cylindrical metal shipping container of 1- to 12-gallon capacity and constructed of 29 gauge and heavier material.

Drums – any cylindrical metal shipping container of 13 to 110-gallon capacity.

For additional information, please call Tom Williams at FTS 692-5226.

cc: VOC Contact, Regions I - X
Jim Berry, ESED