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: December 12, 1980

SUBJECT: Meeting with the Batesville Casket Company to determine LAER for metal casket finishing

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The Batesville Casket Company is considering a new plant which would produce 100,000 "units" annually. The two-shift operation reportedly would have a VOC emission rate of 167 tons per year. Future expansion could increase annual production rate to 286,000 units with an attendant increase in emissions. Members of the company met with EPA to explain why they believe the RACT recommendations in the Miscellaneous Metal Products CTG are not reasonable and to persuade us that their recommendations for LAER indeed represent the lowest achievable emission rate for their industry. As part of their presentation they made clear that the decision to build the new plant, rather than expand an existing facility in Batesville, Indiana, was a near toss-up. Significant problems with obtaining their permit in Kentucky would cause them to resort to an expansion in Batesville, Indiana.

The Miscellaneous Metal Products CTG defines 3.0 pounds of VOC per gallon of coating less water as the solvent content in prime and color coatings that are reasonably available for the category of miscellaneous metal parts which would include caskets. For clear coats, the recommended emission limit is 4.3 pounds per gallon less water. Batesville proposes to start up their plant using several coatings that would not meet these recommended limits. The coating with the greatest deviation from 3.0 is the color coat which would be a high-solvent lacquer with only about 8-10% volume solids. (About 6.6 #/gal coating less water). The 3.0 coatings would represent about a 90% reduction from the 6.6 #/gal less water coating.

After extensive discussion it was agreed that the need for the high solvent lacquer was based solely on aesthetics and competition in the marketplace rather than durability, longevity, corrosion protection, etc.

Furthermore, the company claimed that because of the very competitive nature of their business, and the need for high-gloss and the aesthetic appearance, that no manufacturer of caskets would be able to compete if forced to resort to an enamel type coating with its attendant higher solids content. It was their contention that no casket company now uses enamel coatings for

their appearance coat and further that the unique structure of the industry would make it doubtful under present environmental regulations on PSD or RACT that any company other than Batesville would be required to adopt such coatings. Batesville contends that the industry is generally made up of very small manufacturers. They report there are approximately 450 small casket manufacturers around the nation most of which are located in rural areas and have emissions of less than 100 tons per year. Hence these would not be required to control solvent emissions. If Batesville were required in their new facility to change their appearance coat to one with a higher solids content they claim the reduced gloss and depth of color would result in their inability to compete or maintain their present market share. Their position is that under no condition would they build this new plant if they are forced to cease use of lacquers because of the disadvantage they feel this would place on their competition with products of other companies.

The representatives of the company were however quite candid in expressing their willingness to accept use of lower solvent coatings if such a requirement was placed on all members of the industry. It was quite obvious that their problem is one of economics, not technology. They feel their product would be at a competition disadvantage when displayed competitively in the showroom.

We briefly discussed the prospects of add-on control specifically incineration since their ovens presently operate at around 280 degrees F.

The company felt that this was not an economically viable operation; however they will discuss this with their incineration consultant and let us know what the expected cost would be if an incinerator were operated on their oven.

The meeting closed with the agreement that Batesville would provide to us a list of the names and addresses of their competitors and the expected cost of installing add-on equipment onto their ovens. Further, they will calculate the allowable emission rate based on use of complying coatings and compare the results against the emission rate that they will have using the coatings they recommend as part of their proposal. This will quantify the reduction required to meet RACT bubble. I agreed that we would contact some State and local agencies and find the expected effect of the CTG which States must adopt in 1982 on their industry.

Even if we find the lower solvent waterborne asphalt coating (0.5 #/gal) that they propose to use offsets the high solvent topcoat making them acceptable under a RACT bubble, it is likely that such a combination should not be accepted as LAER. Further, we must be wary of accepting coatings in this new plant that are higher in solvent content than States may require for existing plants in the 1982 SIP's.

(NOTE: The notes by Dave Salman are handwritten photocopies and impossible to read in some parts, and therefore are not incorporated into this memo.)