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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

JAN 28 1981

Mr. A. R. Dammkoehler
Air Pollution Control Office
Puget Sound Air Pollution Control Agency
P.O. Box 9863
Seattle, Washington 98109

Dear Mr. Dammkoehler:

Your letter to Douglas Costle dated December 22, 1980 concerning Federal coating specifications has been referred to my office for reply. Your concern of a double standard due to Federal contract specifications is understandable. However, we did not intend for State/local agencies to exempt all coatings that are subject to Federal specifications.

We do not feel that the Federal government or industries subjected to Federal specifications for their products should be treated any differently than other large customers who also use contract specifications when purchasing equipment. It is not justified to exempt all coatings whose properties are controlled by Federal specifications and the use of which is required by as Federal agency. If Federal specifications are worded as performance standards and those standards can be met by complying coatings, the use of these coatings should be mandatory.

It is recognized that special coatings, those with unique properties used for certain military, scientific, or experimental purposes, should be exempted. These would include one of a kind type coating and not include all coatings with Federal government specifications.

There is an ongoing program within the Department of Defense's Environmental Quality Division to revise various existing Federal specifications, including those governing the painting of miscellaneous metal parts for aircraft to allow compliance with the various EPA emission control requirements. Your letter of December 22, 1980 is being forwarded to Mr. George Marienthal, Deputy Assistant Secretary for Defense for Environmental Quality, for his information.

My office will contact the appropriate person(s) within the Department of Defense to learn the status of this program and to offer any assistance that would be of help in the revision of the Federal specifications in question. My staff will also inquire as to what other areas of product manufacturing subjected to Federal specifications are under review either in the Department of Defense or elsewhere. A follow-up will be initiated to determine where EPA could provide additional information or assistance.

In response to your particular situation, if the specifications are worded such that compliance with CTG requirements is feasible, the sources should comply with no special treatment accorded. If, however, the specifications are so worded as to clearly prohibit compliance with the CTG RACT requirements (i.e., formulation prescribed by Federal standards), EPA would consider a delayed compliance schedule to allow time for either revision of the Federal specification or time for development and installation of the needed controls.

I hope this information will be helpful to you in your VOC emission reduction program.

Sincerely yours,

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

Enclosure

cc: Donald Dubois, Regional Administrator, Region X
George Marienthal, Deputy Assistant Secretary
for Defense for Environmental Quality

bcc: Richard Thiel, Chief, Air Branch, Region X
Ken Lepic, VOC Contact, Region X