

03/22/1982

VOC210322821

Category: 21 – Graphic Arts

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

March 22, 1982

OFFICE OF THE
ADMINISTRATOR

Ms. Margaret Rogers
Director of Regulatory Affairs
Printing Industries of America, Incorporated
1730 North Lynn Street
Arlington, Virginia 22209

Dear Ms. Rogers:

Thank you for your letter of January 11, 1982, regarding our draft control techniques guideline (CTG) document for the "heatset web-offset lithographic printing" industry. I appreciate your concern over use of the draft document. I know that you and Dr. William Schaeffer have discussed the associated issues with Mr. Edward Tuerk at your December meeting at Waterside Mall. It is clear that the "heatset web-offset lithographic printing" industry is a diverse industry for which no single air pollution control scheme is uniformly applicable. I'm sorry to hear that your group is having difficulties in working with state agencies because of interpretations of EPA's CTG document.

The Clean Air Act requires that states not in attainment with the national ambient air quality standard (NAAQS) for ozone must adopt regulations implementing "Reasonably Available Control Technology" (RACT) for major stationary sources of volatile organic compound (VOC) emissions. CTG documents have been drafted to aid states in determining RACT. As a result, the Agency has prepared CTG documents for a number of VOC sources to which available air pollution control systems can be effectively applied. The documents usually identify an emission level which is representative of applying RACT to typical installations in the applied directly to each and every source. States are encouraged to, and must use judgment in adopting regulations and to make allowances where installation of air pollution control systems could impose unreasonable cost, energy, or environmental penalties.

We chose the "heatset web-offset lithographic printing" industry for the CTG program since it is a major VOC source, and because air pollution control measures are already in use on many printing presses. These measures could effect significant emission reductions at many plants where such measures have not been implemented. Our decision to terminate development of the CTG document for "heatset web-offset lithographic printing" was based on our inability to identify a level of emission control that could be achieved by all types of printing presses. The draft CTG document, however, contains a wealth of data and information since it is a major VOC source, and because air pollution control measures on VOC emissions, emission control system effectiveness, and emission control system costs which is not readily

available from other publications or sources and can be used as guidance. These documents are clearly marked "Draft" and contain the following notice: "This document has not been formally released by the Environmental Protection Agency and should not be construed to represent Agency policy." Consequently, it does not seem appropriate or necessary for EPA to advise states to disregard the draft document in reviewing new source permits or adopting additional rules or regulations. However, I am sending a copy of this letter to each of our regional administrators for their use in working with states and local agencies.

States that are not in attainment with the NAAQS for ozone are currently faced with making complex and difficult decisions. Many states will have to require application of stringent air pollution control measures and the ultimate decisions as to which measures are reasonable lie, as they should, with the states. EPA will continue to serve as a technical resource to advise states of the effectiveness, cost, energy, and environmental impacts of available control technology.

Please let me know if I may be of further assistance.

Sincerely yours,

John W. Hernandez, Jr.
Deputy Administrator

cc: Regional Administrators