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VOC470416841

Category: 47 – Compliance Date Extension

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF
5AMD

April 16, 1984

Daniel J. Goodwin, Manager
Division of Air Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Street
Springfield, Illinois 62706

Dear Mr. Goodwin:

Existing statutory requirements and USEPA policy, e.g., the July 29, 1983 Sheldon Meyers memorandum, provide explicit ambient (ozone) air quality related criteria for Organic Compounds (VOC) compliance date extensions which are proposed as site-specific SIP revisions. These requirements prohibit a compliance date extension from being granted if it would interfere with attainment or maintenance of the ozone National Ambient Air Quality Standards (NAAQS) or Reasonable Further Progress (RFP).

The purpose of this letter is to provide USEPA's technical criteria for evaluating compliance date extensions which are not prohibited by air quality considerations. This technical criteria is intended to supplement existing USEPA policy which covers certain industries.

The two major elements which are considered are the expeditiousness of the schedule and also the likelihood of success associated with the proposed compliance plan. This evaluation is primarily applicable to programs in which final compliance is to be achieved by reformulation to low solvent coatings.

In order to properly evaluate proposed SIP Revisions, a company's efforts to convert to complying coatings must be well documented. This documentation must be sufficient to indicate both progress in achieving compliance through a reformulation program and the extent of the company's past efforts in pursuing a reformulation program.

The typical phases of a conversion program are outlined below:

- 1) A surface coating source should have contacted an extensive number of potential coating and ink suppliers, as well as its trade association, when the applicable state rule was adopted. These contacts should have occurred substantially before the compliance date, typically in 1979 or 1980.

- 2) The available suppliers submit complying coating materials which are appropriate for the particular source. These coatings are then tested by the company in limited, full production runs although this step may be preceded by pilot runs if a company has a pilot coating line.
- 3) The coated product is subjected to an array of standardized tests. Depending on the nature of the ink or coating, these tests could check for properties such as color intensity, gloss, coating feel, opacity, abrasion resistance, adhesive power, etc. This process identifies any promising coatings.
- 4) Those coating suppliers with promising candidates attempt to modify their products to overcome whatever deficiencies they contain. Any new coatings to emerge from this step are evaluated in the manner described in the previous step.
- 5) The final step is obtaining customer approval of the printed and/or coated product. This can be the most difficult step because of the natural reluctance of a customer to have a successful product altered and the unforeseen complications that can occur when the coated product is put to its ultimate use.

The following information should therefore be submitted to document a claim of expeditiousness:

- 1) Correspondence with coating suppliers;
- 2) A description of pilot and full production test runs including their inception, frequency, duration and results; and
- 3) A description of the past efforts at obtaining customer approval and assessment of future prospects.

Four years have passed since many of the surface coating regulations were adopted. A conversion program should, therefore, be reasonably well advanced by this time. In general, USEPA's position is that of a surface coater will not have reached the point of trying to obtain customer approval with an apparently acceptable coating material by the end of 1984, then the reformulation program would not seem to have a reasonable chance for success and is therefore unacceptable.

When applicable, incremental yearly reductions and a commitment to install add-on control (if the reformulation program fails) are important components of a reformulation program. The preliminary engineering and selection work should be completed prior to the final cut-off date for determining whether add-on control is required. If necessary, the control equipment could be purchased immediately after a determination is made that it is required. If this procedure is followed then a year would be sufficient, in most cases, for installation of add-on control to be completed.

In summary, a compliance date extension must be sufficiently well documented to substantiate that a reformulation program is both expeditious and likely to succeed.

Please contact Steven Rosenthal of my staff, at (312) 886-6052, if you have any questions regarding this letter.

Sincerely,

Steve Rothblatt, Chief
Air and Radiation Branch