

05/07/1984

VOC440507842

Category: 44 – Surface Coating of Vinyl-coated Fabric or Vinyl Sheets

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

May 7, 1984

MEMORANDUM

SUBJECT: Topcoating and Printing of Urethane Fabric and Sheets

FROM: G.T. Helms, Chief
Control Programs Operations Branch (MD-15)

TO: Linda Murphy, Chief
Air Programs Branch, Region I

The Massachusetts Department of Environmental Quality Engineering has submitted information to the volatile organic compound (VOC) reasonably available control technology (RACT) clearinghouse indicating that coating or printing of urethane coated fabric or urethane sheets at existing facilities are subject to the vinyl surface coating control technique guideline (CTG) emission limit, e.g., 3.8 lbs VOC per gallon of coating, less water. This appears consistent with the Federal Register notice (48 FR 46224) dated October 11, 1983, wherein the Administrator judged that it is reasonable to include the printing of flexible urethane coated fabrics in the proposed new source performance standards for flexible vinyl coating and printing operations. However, it is pointed out that the December 2, 1980, memorandum from Richard G. Rhoads, Director, Control Programs Development Division to Director, Air and Hazardous Materials Division, Regions I-X (copy attached) allows States, where they deem it appropriate, to control specialty printing under the graphic arts CTG using emission limits specified in that document. There may be some instances where these operations involve specialty printing and would be more appropriately addressed by that CTG.

Therefore, it is our opinion that topcoating or printing of urethane coated fabric or urethane sheet at existing facilities should be subject to the same CTG emission limits as required for topcoating and painting on vinyl coated fabric or vinyl sheet.

Should you have any questions, please contact John Calcagni (629-5665) or Bill Polglase (629-5516).

Attachment

cc: Chief, Air Branch, Regions II-X
VOC Contact, Regions II-X
Cynthia Greene, Region I
John Hanisch, Region I
Walter Sullivan, State of Massachusetts

Attachment

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

DATE: December 2, 1980

SUBJECT: RACT for Specialty Printing Operations

FROM: Richard G. Rhoads, Director
Control Programs Development Division (MD-15)

TO: Director, Air and Hazardous Materials Division
Regions I-X

A memorandum from Tom Helms dated August 4, 1980, "Applicability of Paper Coating, Fabric Coating, and Graphic Arts CTGs," indicated that specialty printing should be covered under the Paper Coating and Fabric Coating CTGs. That memo was issued to try to remove the confusion regarding which processes are subject to the Paper Coating and Fabric Coating CTGs (Volume II), and which are subject to the Graphic Arts CTG (Volume VIII). Owners of specialty printing operations reportedly have historically considered themselves part of the graphic arts industry. Some States have also considered them to be graphic arts processes.

The August 4 memo recognized that the control technology embodied in the Paper and Fabric Coating CTGs can be applied to specialty printing operations. However, case-by-case determinations would be necessary to provide relief for those specific operations that are so similar to conventional printing, that the emission limitations in the Paper and Fabric Coating CTGs might not be appropriate. Unfortunately, the numbers and variety of specialty printers have made such determinations exceedingly complex for both industry and many States. Recent discussions with industry and State agencies confirm the continuing existence of these misunderstandings.

We are revising our August 4 memo to allow States, if they deem it appropriate, to control specialty printing under the Graphic Arts CTG using the emission limits specified in that document. However, a State may also decide that a particular type of specialty printing is so similar to a paper or fabric coating operation that such installations should be controlled under the provisions of the Paper or Fabric Coating CTG. Those States still in the process of negotiating compliance schedules with specialty printers based on the Paper and Fabric Coating CTGs should continue such negotiations.

Specialty printing operations may be considered to be all gravure and flexographic operations which print a design or image, excluding publication gravure and packaging printing. Specialty printing operations include, among other things, printing on paper cups and plates, patterned gift wrap, wallpaper, and floor coverings.

All coating operations, including gravure operations, where the coating line applies only a uniform layer of material across the entire width of the web, will continue to be subject to the definitions and controls in the Paper and Fabric Coating CTGs (Volume II).

For additional information, contact Tom Williams (629-5226).

cc: Chief, Air Programs Branch, Regions I-X
VOC Contacts, Regions I-X