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**Category:** 4 – Surface Coating of Paper Products

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

June 3, 1983

Mr. Donald Theiler  
Director, Wisconsin Department of  
Natural Resources  
Bureau of Air Management  
Box 7921  
Madison, Wisconsin 53707

Dear Mr. Theiler:

This is in response to your letter of March 30, 1983, addressed to Thomas Williams, requesting information related to a book cover coating operation conducted by C.B. Henschel Manufacturing Company.

Specifically, you requested (1) a determination that their facility is properly classified as a paper coating operation with regard to a laminating operation (a process description for the laminating operation was enclosed), and (2) a list of book cover coaters which currently comply with the RACT limitations for paper coaters.

EPA guidance concerning paper coating operations has been that for all coating operations where the coating line applies a uniform layer of material across the entire width of the web, it is subject to the definitions and controls in the paper and fabric coating control technique guideline (CTG) document, EPA-450/2-77-008, dated May 1977. The C.B. Henschel laminating operation process description indicates that it would be subject to the paper coating recommended emission limitation (2.9 lbs VOC/gallon of coating less water).

With regard to item 2, page vii of the CTG document indicates that these limits can be achieved in all cases using incineration and, in many cases, with coatings that contain low fractions of organic solvents. In addition, our Region V office [Steve Rosenthal, telephone No. (312) 886-6053] can provide the names of some companies that use a laminating process and are classified as paper coaters.

Apparently, the company is making progress in obtaining low solvent coatings for use in their laminating process that would comply with paper coating emission limitations. Usually, such efforts require reasonable development time to get an acceptable coating material. If, however, within a reasonable period of time, it is determined that such coatings cannot be developed, the company should commit to the installation of add-on control equipment.

It is hoped that this meets your present need. If we can be of any further assistance, please contact us.

Sincerely yours,

G. T. Helms  
Chief

Control Programs Operations Branch

cc: D. Crumpler, ESED  
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