UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JAN 16 2008

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Reasonably available control technology (RACT) for Paper, Film and Foil Coating

FROM: for William T. Harnett, Director
Air Quality Policy Division Scott Mathias

TO: Regional Air Division Directors

In September 2007, the Environmental Protection Agency (EPA) issued a new Control Techniques Guideline (CTG) for paper, film, and foil coating operations. We are issuing this memorandum to clarify that the 2007 CTG does not supersede the control recommendations in the 1977 CTG, but is intended to complement the 1977 CTG by recognizing that greater emission reductions are reasonably available for certain larger sources of emissions – i.e., specific coating lines at or above 25 times per year (tpy), and to recommend appropriate practices for cleaning operations. In developing any new reasonably available control technology (RACT) limits for sources addressed by these CTGs or considering whether to modify existing RACT limits, States should consider the recommendations in the 2007 CTG as well as those recommended in the 1977 CTG.[1] We further note that section 182(b)(2)(B) of the Clean Air Act continues to require States to include RACT rules for all volatile organic compounds (VOC) sources covered by a pre-1990 CTG. Thus, removal of RACT limits for sources addressed by the 1977 CTG would not be consistent with the section 182(b)(2)(B) requirement. It is important to recognize that the CTGs are guidance documents and do not establish binding RACT requirements. In adopting and submitting RACT rules, States should justify why an adopted rule meets the RACT requirement for the specific source or source category subject to that Rule.

If you have further questions regarding RACT applicability, please contact Bill Johnson at (919) 541-5245, or johnson.williamL@epa.gov.

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[1] See also "Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations," May 1988, (known as the "Blue Book") which clarifies that the cutpoints applicable under the 1977 CTG are 3 lb/hr or 15 lb/day actual emissions for paper coating.