



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

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OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Gary A. Jones, Manager
Environmental, Health, and Safety Affairs
Graphic Arts Technical Foundation
200 Deer Run Road
Sewickley, Pennsylvania 15143-2600

Dear Mr. Jones:

This is in response to the May 17, 1997 letter from you, Mr. Ben Cooper, and Mr. Dale Kalina concerning the topics discussed at our meeting on March 12, 1997. We agree that progress has been made on some topics and that further discussion is needed to explore the means to resolve others.

For each source category, including offset lithographic printing, to be regulated under the consumer and commercial products provisions in Section 183(e) of the Clean Air Act, a decision must be made whether to develop a national rule or a control techniques guideline (CTG). While all the details of the decisionmaking process are not established, various aspects of the offset lithographic printing industry appear to make it a better candidate for a CTG than for a national rule.

Our work on the hazardous air pollutant standard and consumer and commercial products rule, or CTG, for paper and other web coating continues. In order to clarify the relation between these efforts and work directed specifically at offset lithographic printing, we believe we need a better understanding of where and how "coating" is done by offset lithographic printers. Specifically, whether the "coating" is done on press, in line with the press, or on a separate machine; and whether the material applied is unpigmented offset lithographic printing ink (varnish), ultra-violet light cured, waterborne, or solvent-borne.

We recognize the need to explicitly state our position on what is and is not needed to demonstrate capture of heatset web offset lithographic printing ink oils in heatset web offset dryers. A document specifically addressing this issue and explaining the rationale for our position is being prepared and is expected to be completed by mid-August. In the meantime, I would like to take this opportunity to reaffirm the information provided in the draft CTG and the alternative control techniques (ACT) documents for offset lithographic printing. Specifically, our position is that if a heatset web offset dryer is operating at negative pressure, then all of the heatset web offset lithographic printing ink oils that are not retained in the substrate can be

assumed to be captured in the dryer and available for delivery from the dryer to a control device. The draft CTG and ACT documents suggest assuming that 20 percent of heatset ink oils are retained in the substrate. Further, our position is also that there is no need and no benefit in having heatset web offset lithographic printers conduct temporary total enclosure, or any other type of capture tests, to establish heatset web offset lithographic ink oil capture efficiency.

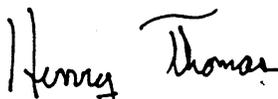
We are still looking forward to receiving your data on Method 24 testing of offset lithographic printing materials. Dave Salman spoke with Peter Ford of U.S. Ink at the recent meeting of the American Society for Testing and Materials (ASTM) D-01 Committee on Paint and Related Coatings. This discussion provided insight on ideas for improving the performance of ASTM Method D-2369 on paste inks that may be explored by the ASTM D-01 committee.

I am pleased that your discussions with Tim Smith on potential to emit are going well. I look forward to continued progress in this area.

The other topics in your letter, operating permit program concerns beyond the potential to emit items already being discussed with Tim Smith and the choice of stack test method and process conditions during stack tests, are areas that require further discussion to ensure common understanding of the issues and explore potential resolutions. We look forward to hearing from you concerning possible meeting dates and will be sure to have the appropriate staff attend the meeting. Please coordinate the scheduling and agenda for these discussions with Dave Salman at (919) 541-0859.

I appreciate this opportunity to be of assistance and trust that this information will be helpful.

Sincerely,



John S. Seitz

for Director

Office of Air Quality Planning
and Standards

cc: Linda Herring, ESD (MD-13)
Bruce Jordan, ESD (MD-13)
Tim Smith, ITPID (MD-12)
Candace Sorrell, EMAD (MD-19)