



October 15, 1997

Mr. David Salman
Emissions Standards Division (MD-13)
United States Environmental Protection Agency
Research Triangle Park, North Carolina 27711

Dear Dave:

Thank you for meeting with the Environmental Council of the Gravure Association of America (GAA) last month. After we met with you on September 8, 1997, the group reconvened the next day to further discuss the outstanding issues that remain in regard to the NESHAP for the Printing and Publishing Industry.

As we mentioned to you, the industry is nearing a critical point in the development of compliance plans. Our member companies are currently preparing capital and operating budgets for fiscal year 1998, and in order to comply with the standards by May 1999, decisions have to be made in the next few months.

In the course of our meeting you have indicated that the U. S. EPA plans to resolve the outstanding issues related to MACT standards for our industry, before the end of 1997. You also noted that you were still waiting for some additional data from the industry. We hope that the letter from Temp Elliott of Sun Chemical, dated September 27, 1997 fulfilled our obligation. Our recent conversation with Barbara Francis of Chemical Manufacturers Association assured us that you should also have all data expected from CMA. Please let us know if there is anything we can do to speed up the process of resolving these outstanding issues.

We thought it might be helpful if we prioritized the issues from our perspective. In that way, the more important items may be able to be addressed soon, leaving less critical issues for sometime down your road. For ease of cross-reference with our prior correspondence, we carried over the section numbers, from letter dated September 5, 1997. In order of importance, the GAA would like to see a resolution to the following matters:

GRAVURE ASSOCIATION OF AMERICA, INC.

1200-A SCOTTSVILLE ROAD, ROCHESTER, NY 14624 (716) 436-2150; FAX (716) 436-7689

Record Keeping and Reporting Requirements

63.830 Reporting Requirements

- 63.830 (b) (iv) (5) - The requirement to prepare startup, shutdown and malfunction reports needs additional clarification. The nature of the printing business is such that startups and shutdowns are a normal state of events. The industry recommends that these reports are required, only when an environmental consequence (e.g. excess emissions) results.

Monitoring Requirements

63.828 Monitoring Requirements

- Section 63.828 (a) (5) - The rule requires companies who elect to demonstrate compliance by performance tests (e.g. capture efficiency tests) to identify an operating parameter which best represents the conditions of the test and subsequently monitor that parameter to assure compliance. Given the configuration of most pressrooms, the practicality of identifying a meaningful parameter is questionable.

HAP and VOC Determination

63.827 Performance test methods

- Section 63.827 (b) (iv) - When Method 311 is used to determine the HAP content of a material, and the results of the Method 311 test exceed the manufacturer's formulation data, a certified product data sheet, or other approved method of measuring HAP content, what tolerance level is acceptable? In other words, is there any variation between Method 311 and another approved way of measuring HAP allowable, and presuming the U.S. EPA recognizes that some variation is acceptable, what is the tolerance?
- The industry requests that the same issue be addressed in regard to VOC determination as it relates to Method 24/24A.
- Section 63.827 (b) (2) (iii) (A) - As the rule reads now, all organic HAP present at a level greater than 0.1 percent must be accounted for. This threshold is below what is required by other government agencies (e.g. OSHA) and other environmental rules and regulations. In addition, the chemical manufacturers, primarily due to precedent set by OSHA and EPA, are not set up to track non-carcinogenic HAPs present at levels between 0.1 percent and 1 percent.

In regard to the same issue, the rule implies that this level of tracking is required throughout the manufacturing process. A feedstock may contain between 0.1 percent and 1 percent HAP, but when mixed with another feedstock, the concentration of the particular HAP may fall below the reporting threshold. It is our understanding and plan to account for and report HAP's at the level of 0.1 percent in the final feedstock, as supplied by the manufacturer.

Rule Applicability

63.820 Applicability

- Section 63.820 (a) and section 63.821 (a) - The standard interchanges the terms "source" and "facility" and consequently, may lead to misinterpretation particularly in regard to the packaging and product gravure printers, and wide-web flexographic printers.

63.826 Compliance Dates

- Section 63.826 (a) (b) and (c) - The definition of "reconstruction" and its affect on facilities installing new presses has already generated questions at the state level. The rule does not require a new press to come into compliance before May 1999 unless the facility is "reconstructed," in which case the entire facility is subject to rule at the time of startup. Several state regulators have misinterpreted the rule to mean that any new press, regardless of "reconstruction" status, is subject to the rule at the time of startup. Guidance from U. S. EPA on this issue is asked.
- The publication gravure printers remain concerned that the rule is not clear about "facility-wide" compliance demonstration versus "line-by-line" demonstration of compliance. In other words, clarification is recommended to explicitly explain that the gravure operations as a whole must meet the standard, and not each piece of equipment on an individual basis.

63.821 Designation of Affected Sources

- Section 63.821 (a) (1) - In an attempt to avoid misinterpretation by state regulators, the publication gravure printers request a Federal Register Notice covering flexographic imprinters to make it clear that in-line flexographic imprinters, regardless of the width of paper being printed, are subject to standards as it applies to publication gravure and not wide-web flexography.

HAP Definition

- General comments - There are some organic HAPs present in some inks and coatings that have high boiling points and consequently, do not volatize during the drying or curing process. The industry contends that these materials should be treated as non-volatiles for the purpose of this rule.

Coating

- Coating Definition - The use of the word "coatings" throughout the rule is understood to include, but may not be limited to, the following - hot melt coatings, wax coatings, extruded molten film coatings and cold seal coatings.

Please review the above reference items. We believe our interpretation is correct and in accord with our previous meeting discussions. Should this not be correct, we would appreciate a response and clarification within the next 45 days. Dave, as always, we appreciate your participation at our meetings and your continued assistance in bringing these matters to resolution. I remain.

Very truly yours,



Ann Pantle, Chairperson
Gravure Association of America
Environmental Council

cc: GAA Environmental Council
Linda Herring, U.S. EPA (MD-13)
Mark Wygonik, FPA
Barbara Francis, CMA
Gary Jones, GATF
Cheryl Kasunich, GAA
Greg Tyszka, GAA