

Control Techniques Guidelines (CTG) for the Use of Coatings and Solvents

CTG Stakeholder Group Meeting



Background Information

- The Federal Clean Air Act requires states to implement all reasonably available control technology (RACT) for sources of emissions in ozone nonattainment areas.
- EPA defines RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.



Background Information

- The EPA issues control techniques guidelines (CTG) documents in lieu of national rules for specific sources volatile organic compounds (VOC) emissions.
- States must revise their state implementation plan (SIP) for moderate and above ozone nonattainment areas to include RACT for each category of VOC emission sources covered by a CTG document issued between November 15, 1990, and the date of attainment.



Background Information

- The CTG documents provide information on various emission sources and control recommendations to assist states in their RACT determinations.
- States must determine if controlling emissions from those sources constitutes RACT and determine if it is necessary to develop rules to control those emission sources.
- States can use the recommendations in EPA's CTG documents or adopt different approaches to controlling emissions from the sources.



CTG Documents

- EPA issued 11 CTG documents in 2006 - 2008:
 - Flat Wood Paneling Coatings
 - Flexible Package Printing
 - Industrial Cleaning Solvents
 - Offset Lithographic and Letterpress Printing
 - Large Appliance Coating
 - Metal Furniture Coating
 - Paper, Film, and Foil Coating
 - Automobile and Light-Duty Truck Assembly Coating
 - Fiberglass Boat Manufacturing Materials
 - Miscellaneous Industrial Adhesives
 - Miscellaneous Metal and Plastic Parts Coatings



Flat Wood Paneling Coatings

- Affects manufacturers of:
 - printed interior panels made of hardwood, plywood, or thin particle board
 - hardwood plywood panels
 - Class II finishes on hardboard panels
 - tileboard
 - exterior siding
- CTG recommendations include:
 - VOC content limits on coatings
 - work practice standards for cleaning solvents
- Corresponds with §115.421(a)(10)



Flexible Package Printing

- Affects manufacturers of:
 - bags, pouches, liners, and wraps that are made of paper, plastic, film, aluminum foil, matalized or coated paper or film, or any combination of these materials
 - flexible packaging material that typically use rotogravure or flexographic printing processes
- CTG recommendations include:
 - VOC content limits on coatings, inks, and adhesives
 - optional efficiency requirements for control equipment
 - work practice standards for cleaning solvents
- Corresponds with §115.432(a)



Industrial Cleaning Solvents

- Affects facilities:
 - involved in manufacturing, repair, and service operations in multiple industry sectors that use cleaning solvents
 - listed as a potentially affected source in the CTG document
 - not already subject to another limit on cleaning solvents
- CTG recommendations include:
 - VOC content limits
 - composite vapor pressure limits
 - optional efficiency requirements for control equipment
 - work practice standards for cleaning solvents
- Corresponds with §115.412



Offset Lithographic & Letterpress Printing

- Affects facilities:
 - using offset lithographic printing processes on individual sheets or continuous rolls of substrate material
 - using letterpress printing processes on individual sheets or continuous rolls of substrate material
- CTG recommendations include:
 - VOC content limits for inks and fountain solution
 - optional efficiency requirements for control equipment
 - work practice standards for cleaning solutions
- Corresponds with §115.442



Large Appliance Coatings

- Affects manufacturers of:
 - doors, cases, lids, panels, and interior support parts of large appliances
 - residential and commercial washers, dryers, ranges, refrigerators, freezers, water heaters, dishwashers, trash compactors, air conditioners, and other large appliances
- CTG recommendations include:
 - VOC content limits for coatings
 - specific coating application methods
 - optional efficiency requirements for control equipment,
 - work practice standards for cleaning solutions
- Corresponds with §115.421(a)(1)



Metal Furniture Coatings

- Affects manufacturers of:
 - metal tables, chairs, wastebaskets, beds, desks, lockers, benches, shelves, file cabinets, lamps, or any other metal furniture
 - any metal part that will be part of a nonmetal furniture product
- CTG recommendations include:
 - VOC content limits for coatings
 - specific coating application methods
 - optional efficiency requirements for control equipment
 - work practice standards for cleaning solutions
- Corresponds with §115.421(a)(2)



Paper, Film, and Foil Coatings

- Affects manufacturers of:
 - packaging paper, paper bags, coated paperboard, corrugated and solid fiber boxes, die-cut paper paperboard and cardboard, folding paperboard boxes, carbon paper
 - laminated aluminum foil
 - photographic film, pressure sensitive tape and labels
 - other coated paper, film and foil products
- CTG recommendations include:
 - VOC content limits for coatings
 - optional efficiency requirements for control equipment
 - work practice standards for cleaning solutions
- Corresponds with §115.421(a)(4)



Automobile & Light-Duty Truck Coatings

- Affects facilities that:
 - manufacture new automobile and light-duty truck bodies, body parts for new automobiles or light-duty trucks, and other parts that are coated along with these new bodies or body parts
 - that apply coatings to new automobile and light-duty truck bodies or body parts on a contractual basis
- CTG recommendations include:
 - VOC content limits for coatings
 - optional efficiency requirements for control equipment
 - specific testing requirements
 - work practice standards for cleaning solutions
- Corresponds with §115.421(a)(8)



Fiberglass Boat Manufacturing

- Affects manufacturers of:
 - fiberglass hulls or decks of boats
 - molds to make fiberglass boat hulls or decks
- CTG recommendations include:
 - VOC content limits for gel coats and resins at open molding operations
 - optional VOC content limits for filled resins
 - work practice standards for resin and gel coat mixing operations
 - VOC content and vapor pressure limits for cleaning materials
- New CTG category



Miscellaneous Industrial Adhesives

- Affects facilities:
 - involved in manufacturing, repair, and service operations in multiple industry sectors that apply industrial adhesives or adhesive primers
 - using adhesives that are not already subject to another limit
- CTG recommendations include:
 - VOC content limits
 - specific application methods
 - optional efficiency requirements for control equipment
 - work practice standards for adhesive-related activities and cleaning solvents
- New CTG category



Miscellaneous Metal & Plastic Parts

- Affects manufacturers of:
 - metal or plastic parts that span many industry sectors that apply coatings to those parts
 - metal or plastic parts that are not already subject to another limit
- CTG recommendations include:
 - VOC content limits
 - specific application methods
 - optional efficiency requirements for control equipment
 - work practice standards for coating-related activities and cleaning solvents
- Corresponds with §115.421(a)(8) for metal parts
- Plastic parts are a new CTG category



Informal Comments

- TCEQ is accepting informal comments on these CTG documents
 - CTG documents can be downloaded from the CTG stakeholder group web page:
http://www.tceq.state.tx.us/implementation/air/rules/ctg/control_techniques_stakeholder.html
- Requesting informal comments on:
 - number of affected facilities in the DFW and HGB eight-hour ozone nonattainment areas
 - technical and economic feasibility of the CTG recommendations
 - modifications or alternatives for specific CTG recommendations, such as exemption thresholds, control requirements, etc.
 - suggestions for control strategy concepts in addition to or in lieu of the CTG recommendations



Informal Comments

- When submitting comments:
 - identify the CTG you are commenting on
 - provide as much detail and technical information as possible
 - if suggesting specific rules please provide a copy, web link, or citation for the rule
 - clearly identify any confidential information
 - please explain the basis of economic feasibility information provided on a dollar per ton basis, e.g., capital dollar per ton for the first year, dollar per ton annualized over five years, etc.
- Written comments (non-confidential information only) will be posted on the CTG Stakeholder Group web page:

http://www.tceq.state.tx.us/implementation/air/rules/ctg/control_techniques_stakeholder.html



Informal Comments

- Please submit comments by January 7, 2009
- Electronic comments are preferable, and may be submitted via e-mail to siprules@tceq.state.tx.us
 - All electronic comments should reference Project Number 2008-019-115-EN
- Mail comments to Lindley Anderson, MC 206, Air Quality Division, Chief Engineer's Office, TCEQ, PO Box 13087, Austin, TX 78711-3087
- Fax comments to (512) 239-5687



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