



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SECTOR POLICIES AND PROGRAMS DIVISION
OFFICE OF AIR QUALITY PLANNING AND STANDARDS
OFFICE OF AIR AND RADIATION

DATE: March 1, 2018

SUBJECT: Meeting Notes: Pressure Sensitive Tape Council Meeting

FROM: Kelley Spence (EPA/OAR/OAQPS/SPPD/NRG)

TO: EPA-HQ-OAR-2018-0416

The purpose of this memorandum is to present a summary of the meeting with the Pressure Sensitive Tape Council (PSTC) and the EPA on February 28, 2018 regarding the development of the Risk and Technology Review (RTR) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating (POWC).

Attendees:

- Mike Benson, EPA/SPPD
- Dean DeGhetto, Lamart Corporation
- Katie Hanks, EPA/SPPD
- Mark Hawes, Shurtape Technologies, LLC
- Linda Lavanco, Nitto
- John Metzger, 3M
- Ken Ramm, 3M
- Kelley Spence, EPA/SPPD

Summary:

The EPA met with members of the Environmental Health and Safety Committee of the PSTC on March 1, 2018 to discuss the development of the facility list and the risk modeling input files for the POWC RTR, as well as other regulatory issues. The EPA provided an overview of the Clean Air Act Section 112 rulemaking process and the RTR process; the EPA also provided details on how the residual risk and the technology reviews are conducted, as well as additional actions that are likely to be taken during the RTR process such as removal of the startup, shutdown, and malfunction (SSM) exemption. The EPA then provided an update on the status of the POWC RTR. Specifically, the development of the list of facilities subject to the POWC NESHAP and the risk modeling input file were discussed. The EPA walked members through the draft modeling file that was posted on EPA's RTR website for industry review to assist the review of the file.

Controls utilized to comply with the POWC NESHAP were discussed. It was noted that solvent recovery systems and thermal oxidizers are the most common control devices. It was also noted that regenerative thermal oxidizers (RTOs) have significant secondary impacts which should be accounted for in the RTR. The removal of the SSM exemption was discussed, including potential issues with the removal, averaging time impacts, and potential work practice standards. A statement regarding New Source Performance Standard (NSPS) compliance was requested to be added as part of the RTR amendments indicating that compliance with the NSPS also meant compliance with the NESHAP.

The EPA provided an example electronic semiannual reporting template (40 CFR part 63, subpart QQQQ) for discussion and the compliance equations in 40 CFR 63.3370 were discussed. It was noted that the current language is complicated and overly burdensome – clarification that the equations represent a mass balance approach would be helpful to regulating authorities and regulated entities.

Based on their preliminary review of the draft risk modeling inputs file, members noted that many of the emission units in the inventory were not POWC NESHAP units, pollutants that are not associated with web coating operations were included, and that metal HAP emissions were most likely developed using emission factors that were not valid.