

**Summary of September 27 and 28, 2001 EPA Information Exchange Forum**  
EPA Office of Air Quality Planning and Standards (OAQPS)

11/30/01

**Quick Links**

- I. [Introduction](#)
- II. [Meeting Place and Date](#)
- III. [Participants](#)
- IV. [Discussion](#)  
[Plenary Session Overview](#)  
[Breakout Session Overview](#)
- V. [Next Steps](#)

[Table 1 – List of Attendees](#)

[Table 2 – Summary of Breakout Session Discussions](#)

[Table 3 – Volunteers for Developing Implementation Tools](#)

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**I. INTRODUCTION**

On September 27 and 28, 2001, the Office of Air Quality Planning and Standards (OAQPS) held an Information Exchange Forum "Planning Ahead: Implementation Tools for the Metal Coil and Paper & Other Web Coating MACT Standards."

The purpose of the forum was to provide an opportunity to bring together stakeholders interested in implementation activities associated with the Metal Coil Coating (MCC) and Paper & Other Web Coatings (POWC) MACT standards to discuss implementation tool development needs for these two rules and for Part 63, subpart A, General Provisions (GP).

**II. MEETING PLACE AND DATE**

Sheraton Imperial  
Hotel & Convention Center  
Research Triangle Park, North Carolina

MCC & POWC Discussion  
September 27, 2001  
8:30 a.m. to 5:30 p.m.

and

General Provisions Discussion  
September 28, 2001  
8:00 a.m. to 10:30 p.m.

### III. PARTICIPANTS

A list of meeting participants is shown in [Table 1](#).

### IV. DISCUSSION

The meeting was conducted using both a plenary AND a breakout format for maximum information exchange. The following discussion presents a summary of both plenary and outbreak sessions.

#### **Plenary Session Overview**

The meeting opened with a brief introduction from the facilitators, Mr. John Lingelbach of Decisions & Agreements LLC and Mr. Adam R. Saslow of Consensus Solutions, Inc. Ms. Ingrid Ward of the U.S. Environmental Protection Agency (US EPA) explained the goals of the meeting:

- To determine what types of implementation tools are needed;
- When they are needed;
- In what format the tools should be developed; and,
- Who would be willing to assist in developing the tools.

Mr. Paul Almodovar with the US EPA, provided a brief status update of the POWC NESHAP. Ms. Rhea Jones, also with the US EPA, presented a status update for the MCC NESHAP (see Attachment 1).

After the rule summaries, there was a brief question and answer period where the following rule specific concerns were raised:

#### **Metal Coil Coating**

- The averaging period for the 98-percent overall control efficiency through technology and the need for backup equipment. [??]
- The need for clarity and implementation guidance for the continuous monitoring requirements.
- Whether the draft cost estimates would be revised using current costs (versus the 1997 costs for natural gas). EPA responded that the cost calculations would likely remain based on the 1997 data.
- The need for guidance on what formulation data is required from the coating supplier and what qualifies as certified formulation data.
- How the “hammer” provisions impact the implementation of the POWC and MCC rules and the applicability of the “hammer” to both rules. Would the proposed rules be used on a case-by-case basis?

- Duplication between Title V and MACT requirements, particularly with regard to New Source Performance Standards (NSPS) and reporting. It was recommended that the EPA be flexible with MACT data submittal requests and allow for consolidation with the Title V permits.
- The need for guidance on parameter monitoring for capture systems (e.g., flow, damper settings, etc.)
- The need for guidance on excess emission control plans, equipment malfunctions and best management practices. Templates for startup, shutdown and malfunctions plans were also suggested.
- The need for guidance on any overlap between the MCC rule and the POWC rule.

### **Paper and Other Web Coating**

- How the input and discussion of the rules (i.e., meetings and comments) will be made available to the public. EPA responded that this was handled in the comment/response document.
- The basis for the rule being at the Office of Management and Budget (OMB) when it does not meet “major rule” status. EPA responded that OMB requested review due to the Information Collection Request (ICR) process
- Guidance on applicability determination. With particular respect to crossover issues with the printing and publishing MACT(Subpart KKKK). The need for clarity on how the impact of adding new equipment affects applicability to the rules.
- How the “Once in/Always” policy affects innovative pollution prevention, etc. EPA responded that this policy is not likely to go away but EPA is looking at how the policy can better incorporate pollution prevention initiatives.
- The need for guidance on incentives for pollution prevention and synthetic minor status.

### **General**

- The schedule for developing implementation tools. EPA responded that the goal is to develop implementation tools within one year of the final rule compliance date.
- There is a lack of availability of flexible compliance options at the State level. States require facilities to choose an option and stay with it – identification of alternative operating scenarios with flexibility to use them is not always viewed favorably.
- Overlap in applicability at facilities subject to multiple coating standards. Guidance is needed on which potentially overlapping rules would apply, and when. [??? Add to ‘overlap’ work OAQPS via ECR/MRI is already doing?]

### **Breakout Sessions Overview**

For the breakout sessions, the attendees separated into small groups. The goal of the breakout sessions was for each group to identify audiences for education and outreach tools within their organizational structure. Attendees were then asked to identify specific implementation needs/barriers for each audience type. The groups were also asked to identify potential implementation tools that could address these needs and to provide insights as to the format of these tools. Attendees were also asked to help participate in the tool development process.

Prior to the breakout sessions, the following terms were defined:

*Implementation Needs* are defined as the Information someone needs to understand and implement/comply with the new standards.

*Implementation Tools* are defined as the means of providing information about how to implement/comply with the new standards

[Table 2](#) presents an overview of the results of the breakout sessions. The table is broken down by sector (audience type) and identifies the target audience within that sector, the primary needs of that audience and the potential implementation tools that may be needed to assist that specific audience is implementing both standards.

Once reconvened as a plenary group, attendees “rated” the priority tools that were identified in the breakout sessions. The following tools were chosen as a priority for development for both rules:

1. Applicability Flowchart;
2. Frequently Asked Questions (FAQ) lists;
3. Checklist for inspections and citations;
4. VOC/HAP data sheet templates for suppliers; and
5. Short fact sheet on the role of the responsible corporate official.

After identifying the tools that were considered a priority for development, the attendees were asked to volunteer assistance in the development of these tools. [Table 3](#) presents the volunteers for tool development and the format that these tools should be developed in.

## **V. NEXT STEPS**

OAQPS will use the information obtain at the 2001 Coatings Information Exchange forum to develop a Tool Development Plan for both Metal Coil and Paper and Other Web Coating. The purpose of the tool development plan is to keep you abreast of the types of implementation tools and activities that are planned for development, who we are partnering with to develop the tools identified, and when we expect the tools to be available for use. OAQPS will periodically update these plans as new information becomes available.

You may access the tool development plan by going to the following sites:

Paper and Other Web Coating Tool Development Plan

<http://www.epa.gov/ttn/atw/powc/powcplan.html>

Metal Coil Coating [??? Should be up by end of December]

<http://www.epa.gov/ttn/atw/mcoil/mcoilplan.html>

**Table 1. List of Attendees of the September 27 and 28, 2001 EPA Information Exchange**

Last Name	First Name	Affiliation	Phone Number	Email Address
Almodovar	Paul	US EPA – ESD	919-541-0283	almodovar.paul@epa.gov
Anderson	Glen	Pressure Sensitive Tape Council	877-523-7782	pstctape@ameritech.net
Autry	Nick	US EPA – Region V	312-886-2258	autry.nicholas@epa.gov
Brockman	Larry	US EPA – PIRG	919-541-5398	brockman.larry@epa.gov
Brown	Heather	EC/R Incorporated	919-484-0222	brown.heather@ecrweb.com
Carter	Charlie	McNair Law Firm, P.A.	919-786-4061	ccarter@mcnair.net
Cocuzzi	David	Akzo Nobel Coatings Inc.	614-298-1832	david.cocuzzi@akzonobel.com
Garbin	Kelly	National Metal Coil Coating Association	312-321-6894	kelly_garbin@sba.com
Hawes	Mark	Shurtape Technologies, Inc.	828-322-2700 x 4428	mhawes@shurtape.com
Hawkins	Steve	ERM, Inc.	843-856-4270	shawkins@ermse.com
Harris	Jeff	EC/R Incorporated	919-484-0222	harris.jeff@ecrweb.com
Hayes	Jean	South Carolina Dept. of Health and Environmental Control	803-898-4374	hayesmj@columb31.dhec.state.sc.us
Herring	Linda	US EPA - PIRG	919-541-5358	herring.linda@epa.gov
Hofmeister	Howard	Bemis Flexible Packaging	920-303-7417	hghofmeister@bemis.com
Holder	Roy	Kimoto Tech Inc.	770-748-2643	rholder@kimototech.com
Irish	Allen	National Paint & Coatings Association	202-462-6272	airish@paint.org
Jones	Gary	Graphic Arts Technical Foundation	412-741-6860 x 608	garyJGATF@aol.com

**Table 1. List of Attendees of the September 27 and 28, 2001 EPA Information Exchange (continued)**

<b>Last Name</b>	<b>First Name</b>	<b>Affiliation</b>	<b>Phone Number</b>	<b>Email Address</b>
Jones	Rhea	US EPA - ESD	919-541-2940	jones.rhea@epa.gov
Kalina	Dale	R.R. Donnelley & Sons Company	630-322-6709	dale.kalina@rrd.com
Kinter	Marci	Screenprinting & Graphic Imaging Association – International	703-385-1335	marcik@sgia.org
LeMieux	Jeremy	Glenroy, Inc.	414-250-7227	jeramyl@glenroy.com
Loredo	Tomas	Alcoa Flexible Packaging	804-743-6636	taloredo@rmc.com
Loven	Scott	IL/Norplex, Inc.	563-864-4227	sloven@ilnorplex.org
McCusker	Tom	US EPA - Region I	617-918-1862	mccusker.tom@epa.gov
Nelson	Bob	National Paint & Coatings Association	202-462-6272	bnelson@paint.org
Ogrodnick	Stan	Owens Corning	919-876-5081	stan.ogrodnick@owenscorning.com
Olive	Ron	Wise Alloys LLC	256-386-6633	rgolive@wisealloys.com
Owens	Tim	MACTac Bemis	330-688-1111	twowens@bemis.com
Page	Lee	US EPA - Region IV	404-562-9131	page.lee@epa.gov
Pederson	Mark	Rollprint Packaging Products	630-628-1700	mpederson@rollprint.com
Roberts	Eugene	WestPoint Stevens, Inc.	706-645-4645	roberts.gene@wpstv.com
Salman	Dave	US EPA - PIRG	919-541-0859	salman.dave@epa.gov
Shelton	Racqueline	US EPA - PIRG	919-541-0898	shelton.racqueline@epa.gov
Singhal	Ram	Flexible Packaging Association	202-682-4515	rsinghal@flexpack.org
Stimpson	Gary	Nichols Aluminum	319-324-2121	stimpsog@nichosal.com

**Table 1. List of Attendees of the September 27 and 28, 2001 EPA Information Exchange (continued)**

<b>Last Name</b>	<b>First Name</b>	<b>Affiliation</b>	<b>Phone Number</b>	<b>Email Address</b>
Sutton	Lisa	EC/R Incorporated	919-484-0222	sutton.lisa@ecrweb.com
Thimes	Chris	Pliant Corporation	315-986-6255	chris.thimes@pliantcorp.com
Tyszka	Greg	Gravure Association of America	716-436-2150	gtyszka@gaa.org
Verret	Greg	ENVIRON International Corp.	636-498-4447	gverret@environcorp.com
Ward	Ingrid	US EPA – PIRG	919-541-0300	ward.ingrid@epa.gov
Warner	Mary Ann	US EPA – PIRG	919-541-1192	warner.maryann@epa.gov
Wood	Gil	US EPA - PIRG	919-541-5272	wood.gil@epa.gov
Wroczynski	Joseph	Adhesives Research Inc.	717-227-3233	jwroczynski@arglobal.com
Yount	Dave	Flexible Packaging Association	336-741-6309	yountd@rjrt.com



**Table 2. Summary of Breakout Session Discussions**

Sector	Target Audience for Outreach	Primary Needs of Audience *	Characteristics of Information	Potential Tools
Industry	<p><b>Vendors/Suppliers</b></p> <p>(includes monitoring equipment, coating, &amp; process line equipment suppliers)</p>	<ol style="list-style-type: none"> <li>1. How to explain contents within MACT regulation (e.g., list of HAP and amounts)</li> <li>2. How to explain process effects within MACT</li> <li>3. Accepted test methodologies</li> <li>4. Solids and water content of coatings</li> <li>5. Guidance on MSDS, technology information sheets, minimum data thresholds, continuous monitoring guidance</li> </ol>	<p>Reporting Templates</p>	<ol style="list-style-type: none"> <li>1. Use of electronic and technology to create efficiency (vendor's website)</li> <li>2. Parameters and specs for end control device (this should begin with dialogue between the vendor and the facility and requires a summary of monitoring requirements from EPA)</li> <li><b>3. VOC/HAP data sheet for suppliers</b></li> <li>4. Clarifying guidance sheet on how suppliers can determine and calculate HAP content and solids content</li> </ol>
	<p><b>Senior Management</b></p> <p>(includes officers, legal personnel, and manufacturing personnel at the corporate level)</p>	<ol style="list-style-type: none"> <li>1. Compliance deadlines</li> <li>2. Legal consequences of non-compliance</li> <li>3. Capital expenditures</li> <li>4. Production impacts</li> <li>5. Compliance needs</li> </ol>	<ol style="list-style-type: none"> <li>1. General</li> <li>2. Brief</li> </ol>	<ol style="list-style-type: none"> <li>1. Short fact sheets on: <ul style="list-style-type: none"> <li>• Compliance deadlines</li> <li>• Legal consequences of non-compliance</li> <li>• Capital expenditures</li> <li>• Production impacts</li> <li>• Compliance needs</li> </ul> </li> <li>2. Documents which identify the cost of compliance (at least the elements)</li> <li>3. Implementation schedules</li> </ol>

**Table 2. Summary of Breakout Session Discussions (continued)**

Sector	Target Audience for Outreach	Primary Needs of Audience *	Characteristics of Information	Potential Tools
	<p><b>Responsible Corporate Official</b></p> <p>(may be the plant manager, someone onsite)</p>	<ol style="list-style-type: none"> <li>1. Compliance deadlines</li> <li>2. Legal consequences of noncompliance</li> <li>3. Capital expenditures</li> <li>4. Production impacts</li> <li>5. Compliance needs</li> <li>6. Resource Allocation</li> <li>7. Clear understanding of the regulations</li> <li>8. "Why" kinds of issues</li> <li>9. How to do it</li> </ol>	<ol style="list-style-type: none"> <li>3. General</li> <li>4. Brief</li> <li>5. Different language than the corporate tools</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Short fact sheet on the role of the responsible corporate official</b></li> <li>2. One Page matrices on initial notification, reports, due dates, and what needs to be done by when</li> <li>3. Template forms (Notifications, semi-annual reports and self-certifications)</li> </ol>
	<p><b>Plant Environmental Officer</b></p> <p>(may be an engineer, a human resources employee, a maintenance chief, or a safety manager)</p>	<ol style="list-style-type: none"> <li>1. Details</li> <li>2. Contact list</li> <li>3. Strategies for compliance</li> <li>4. Applicability information</li> <li>5. The "why's"</li> <li>6. Reporting frequency</li> </ol>	<ol style="list-style-type: none"> <li>1. Detailed</li> <li>2. Bulletin Board with updated frequently asked questions (FAQ)</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Applicability flowchart</b></li> <li>2. <b>FAQ's</b></li> <li>3. Flowchart of entire rule with supporting detail narrative ("beyond applicability")</li> <li>4. Examples of compliance calculations, case studies, both simple and complex</li> <li>5. Ongoing Q&amp;A Document</li> <li>6. Sample report forms</li> <li>7. Example approved startup, shutdown and malfunction plans</li> <li>8. Workshops on the nuts and bolts</li> <li>9. Title V MACT Placeholder Language</li> <li>10. Model permit terms and conditions</li> <li>11. Rule Book on regulatory interpretations of rules</li> <li>12. <b>Checklist for inspections and citations</b></li> </ol>

**Table 2. Summary of Breakout Session Discussions (continued)**

Sector	Target Audience for Outreach	Primary Needs of Audience *	Characteristics of Information	Potential Tools
	<p><b>Production Personnel and Operations</b></p>	<ol style="list-style-type: none"> <li>1. Operating practices</li> <li>2. Monitoring parameters and frequency (calibration)</li> <li>3. Trouble shooting guidance</li> <li>4. Recordkeeping and reporting information</li> <li>5. Specialized application techniques</li> <li>6. Day-to-day impacts (Do's)</li> <li>7. Guidance on malfunctions and upsets</li> </ol>	<ol style="list-style-type: none"> <li>1. Written procedures</li> <li>2. Simple language</li> <li>3. Bi-lingual</li> </ol>	<ol style="list-style-type: none"> <li>1. Day-to-day compliance checklists</li> <li>2. Work area instructions: <ul style="list-style-type: none"> <li>• Internally developed</li> <li>• Facility specific</li> </ul> </li> <li>3. Organized framework for record maintenance</li> <li>4. Training (internal) from trade associations and structures from EPA</li> </ol>
	<p><b>Purchasing Personnel at the Plants</b></p> <p>(includes R&amp;D personnel and Coating Development)</p>	<ol style="list-style-type: none"> <li>1. Purchasing specifications</li> <li>2. Information from vendors and suppliers</li> </ol>	<p>None</p>	<ol style="list-style-type: none"> <li>1. Use of electronic and technology to create efficiency (vendor's website)</li> <li>2. Parameters and specs for end control device (this should begin with dialogue between the vendor and the facility and requires a summary of monitoring requirements from EPA)</li> <li><b>3. VOC/HAP data sheet</b></li> <li>4. Clarifying guidance sheet on how suppliers can determine and calculate HAP content and solids content</li> </ol>
	<p><b>Trade Associations</b></p>	<p>Applicability</p>	<ol style="list-style-type: none"> <li>1. Global and entry level language</li> <li>2. GOOD information to digest1</li> <li>3. Need to be able to interpret</li> </ol>	<ol style="list-style-type: none"> <li>1. Definitive guidance – applicability flowchart</li> <li>2. Website that links all tools</li> <li>3. FAQ website</li> <li>4. Electronic reminders of all upcoming deadlines</li> </ol>

**Table 2. Summary of Breakout Session Discussions (continued)**

<b>Sector</b>	<b>Target Audience for Outreach</b>	<b>Primary Needs of Audience *</b>	<b>Characteristics of Information</b>	<b>Potential Tools</b>
<b>Federal Government</b>	<b>Federal Enforcement</b>	<ol style="list-style-type: none"> <li>1. Input from affected parties</li> <li>2. Inspection checklists</li> <li>3. Convergence of language (OAQPS) and intent (OECA)</li> <li>4. Nexus of major air programs</li> </ol>	None	<ol style="list-style-type: none"> <li>1. Internal training and education on coating sources</li> <li>2. Applicability flowchart</li> <li>3. Industry sector profiles (produced by industry)</li> <li>4. Inspection checklist</li> <li>5. Same tools as Plant Environmental Officer</li> </ol>
	<b>Regional Staff</b> (includes Permitting, Compliance, and Enforcement)	<ol style="list-style-type: none"> <li>1. Source list (NAICS Codes)</li> <li>2. Compliance options</li> <li>3. Applicability information</li> <li>4. Improved communications channels</li> <li>5. Record keeping and reporting requirements</li> </ol>	<ol style="list-style-type: none"> <li>1. Same tools between regulating and regulated communities</li> <li>2. Parallels to plant level personnel</li> </ol>	<ol style="list-style-type: none"> <li>1. Internal training and education on coating sources</li> <li>2. Applicability flowchart</li> <li>3. Industry sector profiles (produced by industry)</li> <li>4. Inspection checklist</li> <li>5. Same tools as Plant Environmental Officer</li> </ol>
	<b>Federal Programmatic</b>	<ol style="list-style-type: none"> <li>1. Background research</li> <li>2. Risk data</li> </ol>	Not discussed	Not discussed

**Table 2. Summary of Breakout Session Discussions (continued)**

Sector	Target Audience for Outreach	Primary Needs of Audience *	Characteristics of Information	Potential Tools
<b>State Government V.</b>	<b>Inspectors and Permit Writers</b>  (Air and Multimedia)	1. Information on Title V delegated responsibilities 2. The “Big Book” 3. Detailed plant and process information 4. Nexus of major air programs 5. Details 6. Contact list 7. Strategies for compliance 8. Applicability information 9. The “why’s” 10. Reporting frequency 11. Operating practices 12. Monitoring parameters and frequency (calibration) 13. Trouble shooting guidance 14. Record keeping and reporting information 15. Specialized application techniques 16. Day-to-day impacts (Do’s) 17. Guidance on malfunctions and upsets	None	1. Title V MACT placeholder language 2. Permit writer needs an applicability tool 3. Model permit terms and conditions
	<b>State Environmental Commissioners</b>	1. Compliance deadlines 2. Legal consequences if non-compliance 3. Capital expenditures 4. Production impacts 5. Compliance needs	Not discussed	Not discussed

**Table 2. Summary of Breakout Session Discussions (continued)**

<b>Sector</b>	<b>Target Audience for Outreach</b>	<b>Primary Needs of Audience *</b>	<b>Characteristics of Information</b>	<b>Potential Tools</b>
	<b>State Air Toxics Program</b>  (including Compliance and Inspectors)	<ol style="list-style-type: none"> <li>1. Details</li> <li>2. Contact list</li> <li>3. Strategies for compliance</li> <li>4. Applicability information</li> <li>5. The “why’s”</li> <li>6. Reporting frequency</li> </ol>	Not discussed	Not discussed
<b>Other</b>	<b>Consultants</b>	Source list	Other tools to be developed by consultants	Not discussed
	<b>Small Business Assistance Providers</b>	<ol style="list-style-type: none"> <li>1. Applicability</li> <li>2. Catalog of available tools</li> <li>3. Guidance on roles</li> <li>4. Quick reference guides and roadmaps</li> <li>5. Timelines and deadlines</li> <li>6. Once in – always in rule.</li> </ol>	Not discussed	Not discussed
	<b>Elected Officials and Community Leaders</b>	<ol style="list-style-type: none"> <li>1. Applicability</li> <li>2. Benefits of the rule</li> </ol>	Not discussed	Not discussed
	<b>Public at Large</b>	<ol style="list-style-type: none"> <li>1. Sources</li> <li>2. Contact List</li> <li>3. Re-assurance</li> <li>4. Title V and public participation</li> <li>5. Levels of protection</li> </ol>	Not discussed	Not discussed

**Table 3. Volunteers for Developing Implementation Tools**

<b>Implementation Tool</b>	<b>Format</b>	<b>Volunteer</b>
Applicability Flowchart	Adobe Acrobat (*.pdf) Word Processing Document (e.g., MSOffice product)	Marci Kinter Graphic Arts Technical Foundation Dale Kalina Flexible Packaging Association
VOC/HAP Data Sheet Templates for Suppliers	Word Processing format	Flexible Packaging Association Pressure Sensitive Tape Counsel Graphic Arts Technical Foundation
Inspection Checklist	Word Processing Format	Flexible Packaging Association Pressure Sensitive Tape Counsel
Ongoing Frequently Asked Questions Document	Searchable Format	Flexible Packaging Association