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Air and Radiation Docket  
Mail Code 6102 T  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
a-and-r-docket@epa.gov

Re: Docket ID No. EPA-HQ-OAR-2005-0526  
“Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources”  
(72 Fed. Reg. 52958; September 17, 2007)

U.S. EPA’s Proposed Rulemaking:  
National Emission Standards for Hazardous Air Pollutants – Paint Stripping and Miscellaneous  
Surface Coating Operations at Area Sources

## **Introduction**

The Reusable Industrial Packaging Association (RIPA) is the North American trade association for companies that manufacture and recondition reusable industrial packagings such as drums and “Intermediate Bulk Containers” (IBCs). RIPA’s member companies collect, clean and restore used industrial packagings and return them to service as shipping containers. Reconditioning of used steel drums includes cleaning and removal of coatings and other adherents, followed by reshaping and reforming. Reconditioned steel drums are tested for leakproofness and typically painted and lined per customers’ specifications.

RIPA herein submits comments on the Federal Register publication referenced above.

## **Scope of Comments**

### **1. Sources of Emissions and Hazardous Air Pollutants (HAP) for which these area sources are listed - (Section II.E)**

Section II.E describes the “target HAP” for the proposed rule to include cadmium, chromium, lead compounds, manganese and nickel compounds for miscellaneous surface coating operations. RIPA proposes that EPA include exemption criteria for sources that apply only coatings that do not contain the “target HAP”.

Although this exemption may be applicable for many of the potentially regulated source categories, it is especially relevant to sources that conduct surface coating of steel drum packaging, either through reconditioning or manufacturing.

In 1989 the Coalition of Northeastern Governors (CONEG) developed model legislation in an effort to reduce the amount of heavy metals in packaging and packaging components that are sold or distributed throughout the United States. As of July 2007, this legislation has been adopted by nineteen states, and it requires reduction of lead, cadmium, mercury and hexavalent chromium. While this legislation was initially developed to eliminate heavy metals in landfills, it also served to reduce air emissions for packaging materials that are painted.

Upon initial development of the model legislation, the suppliers of coatings for steel drum packaging began phasing out the use of heavy metals. An informal survey of RIPA members indicates that little or no heavy metals are included in coating formulations currently used in steel drum reconditioning.

Thus, RIPA strongly believes that surface coating operations at steel drum reconditioners are not a significant source of the “target HAP”.

## **2. Spray Booth Filters – Section III.D and 63.11173(e)(2)(i)**

Based on a review of the referenced background document “*Comparative Study of Spray Booth Filter System Efficiency*”, RIPA understands that “98% filter efficiency” refers to the particulate removal efficiency of the filter (i.e. removal *across* the filter), not “capture efficiency” which could be construed to be that percentage of overspray drawn *to* the filter. RIPA feels that the use of the term “capture efficiency” in section III.D and in proposed rule paragraph 63.11173(e)(2)(i) is misleading in this context.

## **3. Spray Booth Construction – 63.11173(e)(2)(iii)**

Proposed language for this paragraph is restated below:

Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth.

All spray coating operations at steel drum reconditioning facilities, as well as steel drum manufacturing facilities, are conducted within spray booths that include a full roof, at least 2 complete walls, and ventilation that draws air into the booth. Typically the front and back walls of the booth are partially open to allow for the continuous, “conveyored” transfer of steels drums into and out of the booth. RIPA feels strongly that this type of booth design meets the intent of paragraph 63.11173(e)(2)(iii); however, RIPA feels that the current wording of this paragraph should be modified to ensure that our industry’s typical booth design is compliant.

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walls or complete side curtains, and must be ventilated so that air is drawn into the booth.

#### **4. Spray Booth Operator Training and Certification – Section II.E**

In Section II.E, EPA requests comment on the requirements for operator training and certification. RIPA feels strongly that EPA must allow the use of industry association sponsored training programs to comply with this requirement. While the STAR program may be beneficial for some spray booth operators, the training focuses on hand spray techniques to minimize overspray. Surface coating operations at steel drum reconditioning facilities almost exclusively use automated spray booths with spray guns mounted on custom designed apparatus designed to optimize transfer efficiency specifically for painting steel drums. To comply with the proposed rule, RIPA would work with association members to develop a training program specific for the steel drum reconditioning industry.

RIPA appreciates the opportunity to comment on this important, proposed rulemaking. Please contact RIPA for any additional information.

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