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Consumer and Commercial Products, Group IV
Determination to Issue Control Techniques Guideline In Lieu of Regulations
Docket Number EPA-HQ-OAR-2008-0412
U.S. Environmental Protection Agency
EPA Docket Center Mailcode 6102T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: EPA-HQ-OAR-2008-0411; 73 Fed. Reg. 40230; July 14, 2008.
“Consumer and Commercial Products: Control Techniques Guidelines in Lieu of
Regulations for Miscellaneous Metal Products Coatings...”

The Reusable Industrial Packaging Association (RIPA) is the North American trade association for companies that recondition and manufacture 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.

RIPA supports EPA’s proposal to issue revised Control Techniques Guidelines (CTGs), rather than federal regulations, to control in nonattainment areas emissions of VOCs from surface coating operations for “miscellaneous metal products” (including steel drums and pails).

RIPA also supports the agency’s proposal to adopt into CTG the VOC limits for steel drums and pails found in the South Coast Air Quality Management District’s Rule 1125. RIPA believes that its members could comply with the proposed limits, provided adequate time is allowed to transition to compliant products.

SCAQMD Rule 1125 – Drums, Pails, and Lids Coatings		
Drum/Pail/Lid Type	Coating Type	VOC Limit (lb/gal)
New	Exterior	2.8
	Interior	3.5
Reconditioned	Exterior	3.5
	Interior	4.2

Nevertheless, as this technology and capability are relatively new, it is important to comment on some limiting factors that may affect the implementation of EPA’s new proposed guidance.

- 1) Availability. Compliant ingredient materials *may* not be universally available. Some resin and solvent manufacturers do not place a high priority on developing compliant ingredient materials for the drum and pail industry due to the relatively small volume of consumption by the industry.
- 2) Quality. As changes are made to existing formulations, it may take some time to determine if the new formulations meet the same performance and aesthetic standards that have been provided by other formulations.
- 3) Incineration. For operations that use incineration and rely on VOCs as a supplemental fuel, reducing VOCs could mean utilizing more municipal energy to power the incinerators.
- 4) Technology. As stated earlier, modifying formulations means developing new technologies for which new baseline data, historical data and performance standards may need to be reestablished.

RIPA appreciates the opportunity to comment on this proposal and is ready to answer any questions the agency may have.



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