



RIPA & EPA Region 5 Agree to Work Together on VOC Emission Issue

RIPA and EPA officials Region 5 have agreed to work together to develop a testing protocol to measure emissions of volatile organic compounds (VOCs) at wash facilities for steel and plastic drums and IBCs. Both parties anticipate the effort will be more efficient and cost effective than requiring each company to conduct its own emissions tests.

Region 5 EPA officials have been working with several RIPA members for the past two years to gather data on VOC emissions from reconditioner's wash operations. The Agency believes that some reconditioners have not been properly regulated in accordance with their emission status. When RIPA became aware of the enforcement effort, the association opened a dialogue with the Agency to ensure that future enforcement measures would be applied fairly across the membership and take into account the needs of small businesses.

According to RIPA President Paul Rankin, "If RIPA and EPA can work cooperatively to develop protocols for the creation of VOC emission factors using tests and data gathered at several representative facilities, both the Agency and the reconditioning industry will benefit." Rankin explained that RIPA members will save substantial amounts of money and plant disruption by not having to test individually and hire technical consultants. The cost of testing and hiring consultants can easily exceed \$10,000 per facility, and often much more, noted Rankin. EPA will obtain data that can be applied fairly to an entire industry.

Ms. Letuchy noted that EPA knows of one facility that has total enclosure and controls for emissions and asked if we knew how many other facilities have enclosures and control for container washing. We did not have any information to respond to her question. Also, in response to a question as to whether equipment manufacturers are moving toward incorporating emissions capture in equipment design, we said that most facilities are mature operations with older equipment and there are not many greenfield facilities.

EPA Region 5 has invited RIPA to submit to them for review a document describing in more detail our proposed approach for developing VOC testing standards. This will be done as rapidly as possible.

RIPA will keep all members fully informed about this important program going forward.

