

P4 PILOT WITH PRINTING INDUSTRY

DESCRIPTION:

In response to a request from the Printing Industries of America Inc., Graphic Arts Technical Foundation, Screenprinting & Graphic Imaging Association International, and Flexible Packaging Association, EPA and the printing industry are actively considering a two phased project which will define efficient ways to meet existing air requirements and to provide sufficient operational flexibility for the printing industry to respond quickly to the demands of an increasingly global marketplace. The first phase would consist of two (2) meetings where the printing industry would outline the nature of its flexibility and permitting needs. The second phase would rely upon one or more “pollution prevention in permitting projects” (P4) partnership. Each partnership would involve a permitting authority, printing operator, and EPA. This phase for each such partnership would involve a permit pilot project that addresses on a source-specific basis a significant number of the permitting concerns identified in the first phase. The expected results would include a series of example permit terms that effectively address many of the concern identified in phase I and a rationale for developing such terms.

BACKGROUND:

The EPA is currently exploring the use of flexibility tools in a series of P4 projects in which EPA assists State agencies in developing actual permits. The projects provide operational flexibility to sources within existing regulatory requirements (i.e., without changing the requirements through rulemaking) while the participants commit to exploring innovative approaches to reduce air pollution and enhance environmental protection. These P4 projects are not the same as the Excellence in Leadership, or XL, projects which are a set of actions to develop alternative strategies that will replace or modify specific regulatory requirements on the condition that they produce greater environmental benefit. The P4 projects do not modify existing requirements, but only seek to provide operational flexibility to the source in full compliance with those existing requirements while achieving equal, if not better, protection of the environment.

Two P4 permits have been completed, one for a computer chip manufacturer and one for a fiberglass resin manufacturer of bathroom fixtures. Two additional projects have been proposed involving a chemical batch processor and a tape manufacturing and coating operation. Other P4 pilot projects under consideration include a portland cement plant and two pharmaceutical plants.

The printing sector is diverse in terms of the sizes and types of its operations and, as such, is a potentially strong candidate for one or more P4 pilots. This industry is further characterized by the frequent number of operational changes made in response to the market place. Applicable requirements which apply to these source (e.g., MACT, RACT, SIP process weight, NSR permits) have been implemented differently and often in a very inconsistent fashion. Given the ongoing efforts to issue title V permits to several of these sources, questions have arisen as to how such permits can be designed to provide both the operational flexibility and the environmental protection required by applicable requirements.

Several ongoing efforts have resulted in the pioneering in Pennsylvania between the Commonwealth and the printing industry in the development of a model permit for the offset lithographic printing sector. The printing industry would like to build on these efforts in the form of one or more specific permitting projects which would define effective permit conditions that meet Federal requirements and other applicable additional State of requirements for other sources located at the facility. EPA will provide guidance on Federal regulations and options to design “change management” provisions into the permit to allow greater operational flexibility and, fewer permit revisions, with no less environmental protection.

SPECIFIC CONCERNS:

In particular, several concerns have been raised by the industry in the January 23, 1998, letter:

The lead time to obtain construction and operating permits is increasing. This appears to be due to the increased work load on permitting authorities as a result of the title V operating permit program and/or staffing shortages at these agencies. A simplified and standardized set of permit conditions and limitations for routine permits could free up agency staff and expedite permit issuance without compromising environmental protection. This would be a benefit to the permitting authorities and the permittee.

The Common Sense Initiative for the printing sector has identified a need for a consistent, widely-applicable set of permits specific to printing. EPA staff participating in the CSI program have indicated that development of model permit conditions is a project they believe would be important relative to the printing industry.

The upcoming issuance of Title V operating permits requires a better understanding (by regulators and permittees) of federally enforceable limitations for printing processes, which could be addressed through an evaluation of regulatory requirements and EPA policy and guidelines specific to the printing industry.

Implementation of the Printing and Publishing MACT standard will impose a new set of requirements on a significant segment of the printing industry. A clear interpretation of the applicability of these requirements, through a set of acceptable permit conditions and limitations, will aid both printers and regulators in dealing with these requirements.

The Paper and Other Web Coatings MACT standard development has the potential to impact the printing industry. A clear interpretation of these requirements, as they may apply to the printing industry, will aid both printers and regulators in dealing with these requirements.

Other more specific permitting concerns have also been recently communicated to EPA including:

level of detail in describing regulated entities

treatment of replacement equipment

identification and potential revision/deletion of prior NSR permit conditions which are unnecessarily burdensome, impractical in their enforceability, and/or incorrect in their content

disincentives to pollution prevention

streamlining of testing and reporting of requirements

design of appropriate monitoring conditions, including those which address the recently promulgated CAM rule

unnecessary paperwork and time delay associated with change management

modification of existing equipment

preapproval of certain operational changes and of alternative compliance options

EXPECTED BENEFITS:

The project is consistent with broader EPA goals to participate in partnerships that advance environmental protection in more efficient and effective ways and complements (but is not part of) the ongoing CSI efforts to work with this industrial sector. It also responds to the Administrations' call for reinvention initiatives that develop flexible, facility-wide air permits. In addition, the Agency sees the project as an opportunity to advance its objectives to promote strategies which use pollution prevention and to improve the implementation of title V.

Previous P4 permitting projects have produced benefits to the other affected parties as well. The public has benefited from the effective implementation of the applicable requirements. In some instances a lowering of emissions has occurred as industry has used its increased flexibility to employ pollution prevention in its new technologies. Participating industry strongly supports P4 permits despite some increased monitoring and permit designer costs, since the initial ones have increased operational flexibility and planning certainty and reduced both the paperwork burden associated with permit revisions and the opportunity costs related to delaying important market responses.

State permitting authorities have also benefited from initial P4 permitting experiences. After a larger up-front investment, gains are apparent in lower paperwork burdens from the significantly fewer future permit revisions, the ability to address implementation concerns without rulemaking,

and the establishment of a permit and/or conditions which act as a model for the more expeditious development of permits for similar sources.

STATUS:

The project is in Phase I. A meeting was held on June 2-3, 1998 to define permitting concerns and next steps. Ongoing conversations are occurring with EPA Regions, States, and the printing sector to design a second conference and to identify candidate permitting projects together with the relevant Regions and permitting authorities who are interested in pursuing such a project.

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