

Regulatory & Advocacy Update for UV+EB Users & Suppliers

Rita M. Loof

Director, Environmental Affairs

RadTech International NA

RadTech International

- Environmental Health & Safety Committee
 - RadTech Member volunteers
 - Providing information about UV/EB to federal, state and local government
 - Ensuring a place for UV/EB in legislation, advocacy
 - Provide industry added tools to make a case for UV/EB

Enduser subjected to various regulations

- Federal level: Environmental Protection Agency
- State level: CA Air Resources Board
- Local level: Air Districts
 - Southern California typically has the most stringent emission requirements
- Volatile Organic Compounds (VOCs); Toxics,
- Greenhouse Gases; Energy Efficiency

Challenges

- Regulatory inertia, “the way we do it”
- Multitude regulatory agencies
 - CA -- 35 local air districts plus Air Resources Board
 - States have autonomy to regulate/develop own rules
- Different interpretations of rules
 - California company example, Rule 219 interpretation
- Building upon our success in CA

Sad Examples

- Big Box Retailer
 - \$ 8 Million settlement related to VOC of coatings
 - Some limits in SCAQMD Rule 1113 are 50 g/l
 - \$ 7 Million Notice of Violation
 - “Offering for sale and selling a consumer paint thinner used for thinning shellac with a VOC content in excess of 25_{g/L}”
- SCAQMD suing paint company for \$50 Million

Exemptions

- Permit Exemptions –SCAQMD Rule 219
 - UV/EB materials < 50 grams/liter VOC
- Exemption from CARB CTR
 - CTR = Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants
- Recordkeeping (SCAQMD Rule 109)
 - Monthly recordkeeping: Materials < 50 grams/liter at all facilities
 - Total exemption from recordkeeping: Materials <50 grams/liter at facilities <4 TPY

BACT

- Best Available Control Technology New Listings— finalized February 2021
 - Minor Source, UV Glass Screen Printing Flat Glass
 - UV Spray Booth, wood cabinets
 - Enclosure with automated spray nozzles
 - Non-UV/EB/LED new listing
 - Solvent spray room for guitars, thermal oxidizer
 - 30 PPM of NO_x
 - UV/EB now listed in state BACT clearinghouse

Environmental Protection Agency

- Control Techniques Guidelines
 - Reasonable Available Control Technology RACT
 - Member participation SCAQMD Public hearing
 - SCAQMD Letter to EPA
- EPA considering RadTech's comments, may start with printing operations

California Air Resources Board

- Air Toxics Control Measure Hexavalent Chrome
 - Currently Trivalent Chrome only alternative considered
 - RadTech conference calls with CARB staff, UV/EB education
 - AB 617— Community Air Monitoring Program
 - Potentially can impact 80,000 businesses in CA
 - Permitted equipment subject to requirements
 - Most UV/EB operations are exempt from permit
- Pilot projects, potential funding

SCAQMD Findings

- “UV coating on wood substrate is a viable option to regulatory compliance and coating performance for a wide variety of products.”
- "Supercompliant materials (eg., UV and EB cured materials) typically dry/cure more quickly, using less energy than conventional drying methods which typically use natural gas as a fuel source" [RadTech Report Article became part of Rule 1130-- Graphic Arts]

Supporting End Users

- Providing information to Minnesota State Agency
 - End User Wants to convert to UV technology
 - Minnesota Pollution Control Agency using default emission factor for Particulate Matter
 - Requiring a Public Hearing despite emission reductions
 - End user has asked for RadTech support in educating MPCA about UV/EB
 - Meet Water Gremlin

Other Accomplishments

- California Senate Resolution (details RadTech website)
 - Recognizes UV/EB technology as pollution prevention processes
 - Commends RadTech for its “outstanding commitment to improving the environment and economy through its programs...”
- SCAQMD RadLaunch funding \$5,000
- RadTech Test Method recognized by SCAQMD.
 - Using the SCAQMD policy outside California
 - State agencies autonomous, do not have to follow CA rules
 - CA policy decisions not authoritative but persuasive-- SCAQMD memo calculating VOC emissions from UV/EB

SCAQMD Presence

- RadTech is AQMD Advisor
 - Air Quality Management Plan Committee
 - Local Government/Small Business Committee
 - Permit Streamlining Task Force
 - Test Method Working Group

Future Trends

- Lower VOC limits/More reporting AB617
- Greenhouse gases
- Toxic Air Contaminants
- “Indirect Sources” –Warehouses, Ports, Airports
- Incentives– SCAQMD RFP specified UV/EB/LED
- Regulations for Control Devices (afterburners)
- Parachlorobenzotrifluoride (PCBTF)
 - Most widely used solvent in coatings/adhesives industry
 - Currently an “exempt” solvent, may be considered a VOC

Conclusion

- We welcome your participation
- Helping the industry grow = Your business grows
- Contact information

909-240-0866; rita@radtech.org; RML93@verizon.net

- www.radtech.org
- Regulatory resources
 - www.aqmd.gov
 - www.arb.ca.gov
 - www.epa.gov