

UNFLEXIBLE PACKAGING

**Helping Manufacturers Understand How To Comply With
Environmental Regulations ■ By Glynn Rountree**

Keeping abreast of regulatory change, especially with respect to environmental regulations, has proven to be a challenge for American business. While early environmental laws addressed the industrial sectors which generated the most pollution, now even the smallest industry sectors are being singled out to do their share to improve the environment. For that

reason, manufacturers of flexible packaging are now subject to a rule governing air pollutants that may be emitted from their operations.

On September 13, 2000, the U.S. Environmental Protection Agency (EPA) proposed a rule in the Federal Register designated the "Paper & Other Web Coating National Emissions Standards for Hazardous Air Pollutants." Developed under the authority of the

1990 Clean Air Act, the proposed rule will "limit hazardous air pollutant (HAP) emissions from facilities that coat paper and other web substrates and are major sources of HAP emissions." HAP emissions are air-borne toxic compounds suspected of causing cancer or other serious health or environmental problems. Major sources are defined in the Clean Air Act as facilities that have the potential to emit 10 or



more tons per year of a single HAP or 25 or more tons per year of a combination of HAPs. The EPA estimates that, once the rule is implemented, 80 percent of HAP emissions (based on 1996 estimates) will be eliminated from the covered facilities nationwide, amounting to an estimated total of approximately 32,000 tons per year.

Affected organizations, including the Flexible Packaging Association (FPA), have reviewed the proposed rule, developed comments on how to improve the rule and delivered those comments to EPA by the deadline date of November 13, 2000. EPA will now consider all comments received on the rule, perhaps seek clarification or data related to some of the comments, develop responses to each of the comments received, and issue a final rule by August of 2001.

In addition to the regulatory effort discussed above, another related effort underway between EPA and industry organizations is the development of materials to assist companies in the implementation of the Paper & Other Web Coating Rule. In other words, EPA and printing associations have established an informal, voluntary partnership to help produce a variety of documents that will assist companies covered by the rule to better understand what their obligations are under the rule and what options they have to meet those obligations. The documents to be developed may include a rule overview, compliance timelines, compliance options flowcharts, a list of frequently asked questions and answers, examples of recordkeeping and reporting forms, inspection checklists, and other items that may be deemed helpful. The documents

will be in "plain-language" to facilitate their use. The portion of the EPA web site for the Paper & Other Web Coating Rule and for the rule's implementation materials is located at www.epa.gov/ttn/uatw/powc/pow-cpg.html. It is anticipated that, when finalized, the rule and the implementation materials can be downloaded from the web site.

A similar effort to develop implementation materials involved the EPA and the aerospace industry several years ago in response to a new rule reducing HAP emissions from aerospace manufacturing and rework operations. Indications are that those materials have been of considerable help. Downloads of the implementation materials for the Aerospace Rule have put that rule's web site on the EPA's list of its top 50 downloaded sites nearly every month during 1998 and 1999. Overall, the EPA web site pages get roughly 50 million hits per month.

In addition, the EPA held a stakeholder meeting on December 12, 2000 in Research Triangle Park, North Carolina for those interested in the Paper & Other Web Coating Rule. Besides having provided a forum for affected parties to ask questions related to the rule, the meeting offered another benefit. Reviewing the questions that came up during the meeting will be helpful to highlight the parts of the rule that may be unclear. Such areas may get added emphasis in the implementation materials in order to reduce the chance of misunderstandings about what the regulation requires. One area where some uncertainty existed prior to the stakeholder meeting had to do with flexible packaging manufacturers covered by the "Printing & Publishing National Emission Standards for Hazardous Air Pollutants," which was issued by the agency in 1996. Exactly what, if any, new requirements may affect those facilities because of



the new Paper & Other Web Coating Rule was not entirely clear prior to the December 12 stakeholder meeting.

Numerous organizations are working closely with EPA and with each other to develop implementation materials for the Paper & Other Web Coating Rule. Those organizations include the Pressure Sensitive Tape Council, the National Paint & Coatings Association, the American Forest & Paper Association, the Screenprinting and Graphic Imaging Association, the Graphic Arts Technical Foundation, the Flexographic Technical Association and the Gravure Association of America. FPA will continue to work with these other groups to help shape the new EPA rule.

Our new U.S. President will be faced with many issues, and many

of those issues have an environmental component - climate change, international trade, genetically-modified food, etc. But environmental professionals agree that one certainty is that the American public will continue to demand a cleaner environment. So the challenge faced by industry to stay abreast of the new environmental regulations is not expected to abate. That may be especially true for this industry in particular, since flexible packaging manufacturers are blessed to be in a growing industry, ripe with exciting new product innovations. Environmental Committees at trade associations have proven to be critical in assuring that the EPA develop realistic regulations that improve the environment, yet allow companies to prosper.



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