

REPORTED REQUEST FOR RFC #: 2215

Request for Correction: THIS REQUEST PERTAINS TO THE FOLLOWING EPA DOCUMENT: ALTERNATIVE CONTROL TECHNIQUES DOCUMENT: SURFACE COATING OF AUTOMOTIVE/TRANSPORTATION AND BUSINESS MACHINE PLASTIC PARTS, EPA-453/R-94-017, FEBRUARY 1994. THIS EPA DOCUMENT IS NOT AVAILABLE AS AN ELECTRONIC COPY AND THIS DOCUMENT HAS MISLEADING OR CONFUSING INFORMATION REGARDING SEVERAL ISSUES. I HAVE ASKED IN WRITING (E-MAIL SENT TO DAVE SALMAN ON 3/28/02) ABOUT OBTAINING AN ELECTRONIC COPY AND ABOUT ANSWERING THE ISSUES, BUT HAVE NOT RECEIVED ANY RESPONSE TO MY SATISFACTION. THE ISSUES ARE STATED BELOW:

(1) FOR THE EPA REVIEW OF VOC LIMITS PERTAINING TO AUTOMOTIVE PLASTIC PARTS COATING, WILL EPA BE LOOKING PRIMARILY AT CONTROL LEVEL 2 VALUES FOR AUTOMOTIVE INTERIOR AND CONTROL LEVEL 4 VALUES FOR AUTOMOTIVE EXTERIOR?

(2) WHAT IS MEANT BY BLACK COATINGS UNDER SPECIALTY GROUP A COATINGS? HOW DOES ONE AVOID CONFUSING A SPECIALTY BLACK COATING WITH AN AUTOMOTIVE INTERIOR OR EXTERIOR COLORCOAT THAT IS A BLACK COATING? (NOTE: THERE CAN BE DIFFERENT LIMITS.)

(3) UNDER CONTROL LEVEL 1 FOR EXTERIOR NONFLEXIBLE HIGH BAKE PRIMER, TABLE 4-1 HAS A 3.0 VALUE AND TABLE 6-3 HAS A 3.8 VALUE. WHICH IS THE CORRECT VALUE?

(4) FOR EXTERIOR NONFLEXIBLE HIGH BAKE PRIMER, TABLE 6-3 SHOWS A CONTROL LEVEL 4 VALUE OF 4.5 AND A BASELINE VALUE OF 4.2. THE BASELINE VALUE OF 4.2 IS ALSO SHOWN IN TABLE 4-1, AND THE CONTROL LEVEL 4 VALUE OF 4.5 IS ALSO SHOWN IN TABLE 6-1. WHY IS THE CONTROL LEVEL VALUE HIGHER THAN THE BASELINE VALUE?

Compliance with IQGs: THIS EPA DOCUMENT IS THE BASIS FOR VOC EMISSION STANDARDS FOR PLASTIC PARTS COATING, UNLESS OTHERWISE DOCUMENTED BY THE AFFECTED FACILITY OR STATE AGENCY. IT WOULD BE MORE HELPFUL TO DO THIS WITH AN ELECTRONIC COPY AND WITH THE ISSUES ADEQUATELY ADDRESSED BY EPA. THIS PERTAINS TO THE INFORMATION QUALITY GUIDELINES ON THE QUALITY AND UTILITY OF THE DISSEMINATED INFORMATION CONTAINED IN THAT DOCUMENT AND THEREBY EXPECTED TO BE FOLLOWED BY STATE AGENCIES AND REGIONAL OFFICES. Recommendation: EPA CAN PROVIDE AN ELECTRONIC COPY OF THE DOCUMENT (E.G., POST ON EPA WEBSITE) AND ADEQUATELY ANSWER THE ISSUES.

Impact: THE CORRECTIONS WOULD AID OHIO EPA AND AFFECTED OHIO FACILITIES IN IMPLEMENTING VOC EMISSION STANDARDS FOR PLASTIC PARTS COATING. ALSO, REGION V WOULD BENEFIT IN THEIR REVIEW OF RELATED OHIO EPA ACTIONS.

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