

content. This new section also clarifies that only organic HAP are included in determining HAP content. The reason is that we have no data to indicate that any other HAP, such as inorganic HAP potentially present in pigments or resin solids, are emitted from the production process. We also now include a provision to account for normal manufacturing tolerances that occur in resin and gel coat manufacture.

K. New Source MACT Floors

In the proposed rule, the MACT floor for all open molding and pultrusion operations located at new sources above a 100 tpy HAP emission threshold was a 95 percent weight reduction in HAP emissions. In the final rule, we have subcategorized open molding and pultrusion operations by part size. For open molding and pultrusion operations that produce large parts the floor level of control is now the same as for existing sources. Large parts are defined in § 63.5805 (d)(2). All other new source MACT floors are unchanged.

V. Summary of Responses to Major Comments

This section presents a summary of significant public comments and responses. A summary of all the public comments that were received and our responses to those comments can be found in Docket ID No. OAR-2003-0003 (formerly Docket No. A-94-52).

Comment: We received numerous comments on the above-the-floor requirements for existing sources. First, commenters stated that EPA had significantly underestimated the costs of add-on controls. They stated that industry estimates were, in some cases, ten times higher than our estimates. They stated that we had overestimated the HAP concentrations in the exhaust streams, underestimated the exhaust flows, and omitted costs for continuous monitors.

Second, the commenters claimed that we had not established that 95 percent capture and control was technically feasible for this diverse industry, and that only two facilities out of 433 actually had achieved the 100 percent capture that is required to meet an overall capture and control level of 95 percent. They also stated that these two facilities were atypical of the industry as a whole because they also had collocated coating operations that were also routed to the same control device. They further stated that the criteria of EPA Method 204 of appendix M of 40 CFR part 51 are not feasible for most facilities in this industry. For these reasons, the commenters recommended

that the above-the-floor requirement be removed.

Response: As a result of these comments, we reviewed the costing methodology for the above-the-floor requirements in the proposed rule and made changes to our costing methodology for add-on controls. Some of the major changes were lowering the default inlet concentration to the control device from 100 parts per million volume (ppmv) to 50 ppmv, revising the fan power equation, and using 2,000 operating hours per year, rather than 6,000 hours per year, as a default value in the absence of actual yearly operating information.

Based on these new costs, the cost per ton of HAP emissions reduction of the above-the-floor requirement significantly increased for most process/product groupings. As a result, we have removed the above-the-floor control requirements for all process/product groupings except centrifugal casting and continuous lamination/casting. It should be noted that the comments discussed above were based on open molding operations. We received no comments specifically on the above-the-floor requirements as applied to centrifugal casting and continuous lamination/casting.

Comment: One commenter opposed allowing control requirements for new sources emitting less than 100 tpy to be the same as those for existing sources because a new site has the opportunity to design and incorporate pollution prevention and control strategies that would be cost-prohibitive for existing sources to implement. The commenter recommended that EPA consider more stringent requirements for new sources, including smaller sources, through generally available control technology or other approaches that would not be overly burdensome.

Another commenter adds that EPA's analysis indicates that the best controlled facilities have reduced HAP by only 95 percent, and 95 percent is most likely the maximum extent of historic regulatory requirements. The commenter notes that EPA looked at the experience of existing facilities to achieve greater than 95 percent control through add-on control in conjunction with pollution prevention and did not find facilities achieving greater control than that. While the assessment may be correct for what EPA looked at, the commenter states that examining past experience that lacks regulatory drivers for greater control is not the same as examining the present and future potential for control opportunities. The commenter believes that the proposal dismisses the potential for these two

control techniques (add-on control and pollution prevention) to be applied to new sources.

Response: We agree that new facilities can more easily incorporate pollution prevention and add-on controls. This is the reason we set the new source floor at 95 percent control for most new sources that emit over 100 tpy, and not at the same level as existing source floors.

Facilities that have incorporated add-on controls tend to be larger facilities. New facilities in this industry can be small operations that operate a limited number of hours and still be major sources. These small sources cannot reliably meet 95 percent capture and control given their limited operating schedules and their potential lack of on-site technical expertise. Therefore, we are not requiring a source emitting less than 100 tpy to meet the 95 percent capture and control level.

We examined whether or not we could specify some other level of control for small sources, but we could not determine what would be an appropriate level of capture and control below 95 percent. We also considered basing new source MACT floors for facilities that emit less than 100 tpy on the single best facility that incorporated pollution prevention. However, as discussed in the preamble of the proposed rule, we believed that using one facility that had the lowest HAP content resins and gel coats was unworkable, unless we could show that all new plants would build the same products as the plants that had the lowest HAP content resins and gel coats.

Given this, we had to determine a threshold value above which 95 percent capture and control is feasible for all new plants, given the diversity of this industry. We selected 100 tpy of actual HAP emissions because above this level facilities tend to operate more hours per year and are better equipped to maintain capture and control systems. Also, at the time we proposed the rule, the smallest facility in the open molding process/product grouping that was permitted at 95 percent capture and control emitted approximately 100 tpy. Therefore, we chose this number as the threshold at which 95 percent capture and control is required.

This was not the only approach we could have taken to subcategorize new sources, nor is 100 tpy the only threshold we could have chosen. For example, we could have subcategorized by annual hours of operation. However, depending on the threshold we set, this could result in large, new HAP emissions sources avoiding the 95 percent capture and control