

requirements simply by building a larger facility and reducing hours of operation. By tying the requirement directly to HAP emissions, we believe we have taken the most logical approach from an environmental standpoint and an enforcement standpoint. Also, the 100 tpy threshold is a reasonable choice that means that all new large facilities in most of the process/product groupings will have to meet the most stringent HAP emissions control levels.

*Comment:* We received numerous comments on the new source MACT floor for facilities with open molding, pultrusion, SMC manufacturing, mixing, and BMC manufacturing that emit 100 tpy or more of HAP from these operations. The commenters stated that the 95 percent capture and control requirements of the floor were technically infeasible and too costly. They also stated that 95 percent capture and control does not represent the best HAP emissions control approach when all environmental impacts, such as increases in emissions of criteria pollutant and greenhouse gases, are considered. The commenters note that the CAA states that the best controlled similar source must be the basis of the new source MACT floor; therefore, EPA is only authorized to apply the 95 percent capture and control requirements to facilities that are similar. The sources cited by EPA make uniformly-sized parts in high volume, employ mechanical resin application, and operate three shifts a day. However, they differ from other facilities in the industry. One of the sources is primarily a metal fabrication operation and sends significant amounts of emissions from a painting operation to the control device, making an unusually rich combustion stream. They also claimed that the facility had not been proven to meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51. The other facility employs an open molding operation, and the ability of this facility to actually meet the 95 percent capture and control requirement is open to question. Neither of these sources are similar to any other composites open molding operation.

*Response:* Our available information continues to support that the appropriate new source floor for facilities that emit 100 tpy or more of combined HAP from their open molding, pultrusion, SMC manufacturing, BMC manufacturing, mixing, centrifugal casting, continuous lamination, and continuous casting operations is 95 percent capture and control for several reasons. First, the term "best control" means best control of HAP emissions. The only other

control techniques mentioned by the commenters were the pollution-prevention techniques that make up the existing source floors. The commenters claim that when other environmental impacts of add-on controls are considered, pollution-prevention control techniques are actually superior. They provided examples that showed HAP emissions reductions from pollution-prevention techniques for some facilities of up to approximately 70 percent; however, the actual HAP emissions reductions a facility will achieve based on pollution-prevention techniques will be highly site specific. Also, the highest pollution-prevention HAP emissions reduction examples assume facilities could reduce HAP emissions by enhanced process monitoring, which would reduce materials used. The HAP emissions reductions based on materials-use reductions assumes facilities are not currently using materials as efficiently as they could. There are no data to support this assumption, and the potential for HAP emissions reduction of this type could vary widely. The second example presented by one commenter assumes facilities would use nonatomized gel coat application. However, the same commenter has stated emphatically that nonatomized gel coat application cannot be used at every facility. Therefore, this example cannot be considered to fairly represent the HAP emissions reductions achievable for the industry as a whole.

Our overall estimate of the HAP emissions reduction that would occur with only pollution-prevention techniques is approximately 41 percent for open molding, compared to the significantly higher 95 percent HAP emissions reductions possible with capture and control. The CAA indicates that "best control" in the context of setting floors is the control that achieves the best HAP emissions reduction. Based on this, 95 percent capture and control represents best control for this industry.

Even if we were to consider other environmental impacts of capture and control, 95 percent control would still be considered best control. Calculations provided by one commenter indicates that a total of only 0.15 tons of criteria pollutants are generated per ton of styrene reduction; however, this number appears to be based on one of the three actual operating facilities using add-on controls shown in the commenter's example. Data from another facility using a concentrator/oxidizer system in the same report showed criteria pollutant emissions of 0.06 tons per ton of styrene emissions reduction. Our

estimate at proposal was that, on average, this figure is closer to 0.04 tons of criteria pollutants per ton of HAP emissions reduction. Regardless of which number is used, the amount of HAP emissions reduction is significantly higher than any resulting criteria pollutant emissions. The commenters also cite greenhouse gas effects. They state that 30 tons of greenhouse gases are produced for every ton of styrene emissions reduction.

We reviewed the information that formed the basis of the estimate of greenhouse gas estimates. Based on our analysis, we believe that the estimate of 30 tons of greenhouse gases are produced for every ton of styrene emissions reduction is an overestimate because it is based on examples where the HAP emissions reduction varies between 77 to 84 percent. The final rule will require 95 percent HAP emissions reduction. Also, we believe the air flows used in the examples provided by the commenter are higher than will be required for new facilities. Higher air flows result in increased use of natural gas and higher greenhouse gas emissions. We believe a more accurate number would be approximately 20 tons of greenhouse gases produced for every ton of styrene emissions reduction.

Second, regardless of which number is the most accurate, any contribution of the final rule to global greenhouse gas emissions is insignificant. The total greenhouse gas emissions in the United States exceed 6 trillion tons from fossil fuel combustion alone. However, the difference between emissions of styrene from a facility controlled to the 95 percent level and one controlled using only pollution prevention is significant to the populations living near an affected facility.

The commenters also stated that the facilities that formed the basis of the new source floor are not "similar sources." We disagree because there are actually three sources within this source category that meet the criteria to set a 95 percent capture and control floor. The commenters point out that three is a small number compared to the 433 facilities in the database at proposal. However, the CAA requires the new source floor to be based on the single best performing similar source. Therefore, only one source is sufficient to set a new source floor as long as we determine it is similar. The commenters stated that the source setting the floors operates three shifts (they shut down on weekends). However, we subcategorized new sources by annual HAP emissions. The reason was that larger sources are more likely to operate more than one shift. Also, since this floor only applies