

to new sources, the facility can be designed to meet the necessary production rate with three shift operation if the operator desires to minimize control device startups and shutdowns.

The commenters stated that in two cases, the floor facilities have collocated surface coating operations. Our evaluation of these facilities was based only on the reinforced plastic composites portion of the facility. During site visits to these facilities, we determined that these facilities were required to apply 95 percent capture and control to all major processes due to State regulations. That requirement would apply regardless of whether or not the facility had collocated surface coating operations. Also, the presence of the surface coating operations does not result in a more concentrated exhaust stream compared to facilities without surface coating operations. Thus, there is no technical basis to say these facilities are not similar based on the presence of surface coating operations.

We also reviewed the commenters claim that the facilities that set the new source floor do not actually meet the requirements of EPA Method 204 of appendix M of 40 CFR part 51. Part of that claim was based on the fact that the floor facilities had doors in the PTE that were opened to move parts and materials in and out of the PTE.

One criteria of EPA Method 204 of appendix M of 40 CFR part 51 is as follows: "All access doors and windows that are not treated as natural draft openings shall be closed during routine operation of the process". This criteria is not intended to require that these doors be closed at all times. It means that doors must be closed any time that you are not actually moving parts or equipment through them. Therefore, the fact that the floor facilities open doors to move parts in and out of the PTE does not mean they do not meet the requirements of EPA Method 204.

In addition, we reviewed the compliance determinations for two of the floor facilities. Our review did not reveal any conditions that would indicate that the requirements of EPA Method 204 of appendix M of 40 CFR part 51 are not being met.

*Comment:* The commenters stated that the facilities that manufacture large parts using open molding or pultrusion are not similar to the floor facilities that are the basis of the capture and control requirements for the new source floors. They stated that the facilities used to set the 95 percent capture and control requirement only manufacture small parts and, therefore, should not be used to set a capture and control floor

requirement for facilities making large parts. They also stated that achieving 100 percent capture is not feasible for large parts sources in these process groups. Though EPA had cited facilities that coated large parts in permanent total enclosures (PTE), coating operations cannot be considered similar to the manufacture of reinforced plastic composites. They suggested that any part with any dimension that exceeds 12 feet be considered a large part and be exempt from capture and control requirements.

*Response:* After reviewing the comments and available data, we have determined that the facilities currently achieving 95 percent capture and control are not similar to sources producing large parts. At proposal, we noted that we had not identified any facilities in the reinforced plastic composites industry where processes producing large parts, such as storage tanks and swimming pools, have applied 100 percent efficient capture systems, but stated our belief that such PTE were technically feasible based on large PTE in other industries. We reviewed available data on the facilities in our database and found that facilities producing parts over a certain size presented different technical issues from facilities that have successfully incorporated 95 percent capture and control. As noted in the preamble to the proposed rule, one of these facilities has a PTE large enough to produce large parts. However, the air flows and HAP concentrations exiting the PTE at this facility are not the same as would be expected from a facility using a similar sized PTE to capture and control emissions from large parts production.

We also noted in the preamble to the proposed rule that surface coating operations for very large parts (as large as ocean going ships) had successfully applied PTE. However, we agree that coating operations and reinforced plastic composites operations are not similar sources. Reinforced plastic composites production typically requires more workers per part due to the necessity to both apply and roll-out the resin. Also, large parts are continuously laminated until completion rather than coated in sections.

This difference in sources, while applicable to evaluating floors based on capture and control, does not exist in the case of floors based on pollution-prevention technologies such as the use of low-HAP materials and nonatomized resin application. For that reason, we did not differentiate between large and small parts when setting floors based on

pollution-prevention control techniques for either new or existing sources.

Because we determined that capture and control was not the appropriate floor for large parts manufacture, the floors for these specific operations are now the same as the floors for existing operation, which are emission limits based on the use of low-HAP materials and nonatomized resin application.

However, we do not agree with the commenter's suggested definition of large parts, because it would exempt parts from capture and control requirements where those requirements have already been demonstrated. The largest part produced at a facility where 95 percent capture and control is demonstrated has a volume of 250 cubic feet. If this part were placed in a rectangular six-sided box, the largest side of the box would be 50 square feet. Therefore we chose these criteria as the definition of a large part for open molding. For pultrusion, the largest part produced by a facility with 95 percent capture and control was 2 inches high, 10 inches wide, and had approximately 350 reinforcements. Therefore, we choose these criteria as the definition for large pultruded parts.

*Comment:* Several commenters stated that capture and control requirements would make it difficult for facilities to meet Occupational Safety and Health Administration (OSHA) worker health and safety requirements. Process enclosures at current facilities are designed and operated to provide safe and efficient production of composite products. The primary purpose of enclosures in this industry is to remove contaminated air from the workplace to achieve OSHA requirements for limiting occupational exposures. Enclosures must also allow enough cool air to enter the workplace so that workers are not subject to excessive heat stress. One commenter provided a study that stated that if process enclosure exhaust flows were reduced to increase exhaust concentrations being routed to the control device, worker exposure to contaminants and heat would be increased to unacceptable levels.

*Response:* The use of PTE for capture of HAP emissions should not result in increased worker exposure to contaminants or heat stress if appropriate precautions are taken. As previously noted, one solution is to design the spray enclosures based on meeting worker exposure requirements, and then enclosing the entire lamination area in a PTE. The facilities currently using PTE do not exceed OSHA exposure guidelines. Experience in the printing and publishing industry shows that use of PTE, in many cases, results