

percent or more by weight titanium dioxide. As proposed, these gel coats will be subject to a HAP limit of 30 percent by weight, and all other pigmented gel coats will be subject to a HAP limit of 37 percent by weight.

At the time we developed the proposed rule, we had no data on pigmented gel coats other than white/off-white and some reds. Based on industry comments, we split pigmented gel coat into two groupings, white/off-white and other colors due to the fact that white/off-white gel coats contain titanium dioxide, which is a heavy pigment, while other colors do not. At the time we created this new grouping, we requested data from the industry concerning the HAP contents of pigmented gel coats. The industry representatives indicated that these gel coats typically have 37 percent HAP. Because non-white pigmented gel coats comprise a very small part of the total industry, we elected to accept the 37 percent number rather than attempt to gather additional data. The commenter provided no data to support their request. In the absence of new data, we have no basis to change this floor.

*Comment:* Two commenters request that the category of fire retardant gel coats be exempt from HAP limits. Both commenters note that fire retardant gel coats are used in manufacturing transportation parts, building products, trains, airplane parts, and theaters. One commenter stated that these are all critical areas of applications and require various Underwriter Laboratory (UL), American Society for Testing and Materials (ASTM), and Fire Rating Certifications. It was suggested that fire retardant gel coats be defined as "those used for products for which low-flame/low-smoke resin is used."

*Response:* We have added a process/product grouping for fire retardant gel coats. These gel coats are defined as gel coats used in low-flame spread/low-smoke product applications. We have established a HAP emissions limit of 854 lb/ton which is equivalent to gel coats with a maximum HAP content of 60 percent using atomized application.

*Comment:* Four commenters stated that we need to establish a separate process/product grouping for corrosion-resistant gel coats. The commenters stated that gel coats used in specific corrosion protection applications must meet the same requirements as corrosion-resistant resin. One commenter added that gel coats requiring chemical resistance to a wide range of chemicals including acids, bases, and solvents are often based on the resins similar to those that make up the structural part of the composite and

provide the necessary corrosion resistance. For this reason, the commenters believe that the HAP limitation for corrosion-resistant gel coats should be 48 percent, the same as it was in the proposed rule for lamination resins used to make corrosion-resistant composites. It was suggested that "corrosion-resistant gel coats" be defined as "those used for products made with corrosion-resistant resin" and that the rule limit the HAP content of these materials to 48 percent.

*Response:* We agree that there are technical limitations for corrosion-resistant applications that warrant a separate limit for corrosion-resistant gel coats, similar to the separate limits established for other specialty resins and coatings.

In the final rule, we established a separate HAP content limit of 48 percent for corrosion-resistant gel coats and defined them as "those gel coats used to manufacture products made from corrosion-resistant resin." We believe 48 percent HAP is the appropriate number because the highest HAP content level allowed in all the corrosion-resistant resin process/product groupings is 48 percent.

*Comment:* Several commenters stated that we need an additional process/product grouping for low-shrink resins. These resins have special shrinkage control properties that are unique and cannot be obtained in any other way. These resins were not identified when EPA surveyed the industry. One commenter stated that a specialty process group is needed for high molecular weight, low-shrink resins used in wind turbine blade manufacturing. The resin currently in use is 42 percent HAP unfilled. The facility would be unable to gain any relief by facility averaging because the facility predominantly uses zero-HAP epoxy resin, rather than a low-HAP production resin. Commenters requested that EPA create a subcategory for these resins with a maximum HAP level of 48 to 52 percent.

*Response:* Our understanding is that these low-shrink resins are highly filled resins with special chemistry that allows them to cure at room temperature with significantly less shrinkage than a typical resin. Given the unique properties of this resin, we agree that a separate process/product grouping is appropriate. The resin manufacturer indicated that the maximum HAP content of the resin is 50 percent. Therefore, we have set HAP emissions limits for shrinkage-controlled resins that allow up to 50 percent HAP. This specialty resin costs significantly more than other resins, which provides a

deterrent for facilities using the resin where its special properties are not necessary.

*Comment:* One commenter believes higher HAP limits are needed for the filament application of corrosion-resistant products. The commenter claims that the rule, as proposed, will eliminate use of certain types of corrosion-resistant resins that impart required properties to certain applications. The commenter noted that the proposed limit for corrosion-resistant filament application resins was lower than for noncorrosion-resistant filament application resins. The commenter believes that the HAP emissions limit for all categories of filament application should be 178 lb/ton, and stated that this change will have insignificant impact on EPA's total HAP emissions reductions target, with the difference in HAP emissions reductions being 3 tpy.

Another commenter states that the proposed MACT of 42 percent HAP cannot be met with an isophthalic resin without some compromise to the physical properties of the cured resin. The commenter requested EPA to consider the 48 percent HAP limit found in South Coast Air Quality Management District (SCAQMD) Rule 1162.

*Response:* While we acknowledge the commenters concerns, we developed the floor for this process/product grouping in the same manner as floors for other process/product groupings in open molding. We gathered data from industry and ranked the performance of the facilities in the corrosion-resistant process group and set the MACT floor based on the average of the best 12 percent, as required by law.

Though we are not changing the floor for filament application, we are retaining a provision included in the proposed rule that allows facilities to use the same resin in multiple processes. The rationale for this provision is, while our floor development ranking procedure is correct, we also realize it does not account for the fact that some facilities use multiple operations to produce components of the final product, and the resins used in the subcomponents must be compatible. This provision will allow most facilities the flexibility to use the necessary level of HAP in corrosion-resistant applications because mechanical operations have a higher-HAP content limit.

*Comment:* One commenter recommended that the model point value for corrosion-resistant manual resin application be changed from 124 to 190 to reflect the use of the same