

table. The composites industry is already using these HAP emissions factors to calculate annual HAP emissions. It would simplify reporting and recordkeeping if one set of HAP emissions factor equations were used. Another commenter stated that if EPA uses the UEF, all HAP should be treated as styrene because this is how EPA developed the MACT floors. They noted that these factors are used by industry for toxic release inventory reporting and obtaining permits. According to the commenters, use of these factors for MACT will reduce the paperwork burden for small manufacturers.

*Response:* We reviewed the UEF and the basis for their development. Based on this review, we believe that these equations are acceptable for estimating both HAP emissions factors for compliance purposes and HAP emissions.

As a result, in the final rule we have written the HAP emissions factor equations in Table 1 to subpart WWWW of part 63 to be identical to their equivalent UEF equations. Therefore, facilities will have one set of identical factors for both compliance and HAP emissions estimation purposes.

Because of this change, it was necessary to recalculate the floor values by recalculating HAP emissions factors using the new HAP emissions factor equations for the facilities in our database and reranking the facilities based on the new calculations. Therefore, both the numerical values of the floors (lb/ton) and the equations used to calculate compliance changed. Note the floors themselves did not change significantly because when we reranked facilities using the new HAP emissions factors, the ranking order did not change with two exceptions. In those cases, the new equations caused two facilities to switch places and changed the floor slightly. However, these changes were minor compared to the changes that resulted from other comments we received and additional data we gathered.

In addition, we have added to the final rule equations for the nonatomized gel coat application and for the mechanical atomized controlled spraying of resins. We have incorporated the latter UEF equation in the final rule so that it is applicable only where the controlled spray is achieved through automated or robotic, not manual, spraying.

Finally, we are incorporating only the UEF equations developed for styrene and not those developed for MMA. We are doing this because the data analysis forming the basis of the standards assumed all organic HAP to be styrene.

This is a reasonable assumption as the amount of MMA used is a very small percentage of the total HAP monomer used.

*Comment:* One commenter noted that the proposed rule does not provide for manual application of gel coats. Many gel coats are applied manually as exterior coatings when the major component part is made. The rule should require that for HAP emissions calculations from manual application, gel coat should be considered as a resin with the stated HAP content and the appropriate point value equation should be used. Companies where manual gel coat application is less than 2 percent of the total gel coat usage should be exempt from maintaining records of manual application.

*Response:* We agree with the commenter that the proposed rule did not provide an equation to estimate HAP emissions from the manual application of gel coats and that the rule needs to address this. In the final rule, we have addressed this issue by allowing two options. First, the facility may elect to simply include manually-applied gel coat with spray gel coat application for compliance and HAP emissions estimation purposes. Alternatively, they can elect to treat the gel coat as spray for compliance purposes, but use the manual resin application HAP emissions factor to estimate HAP emissions.

We believe the changes discussed above are sufficient to simplify reporting and recordkeeping for manual gel coat application. Therefore, we have not added an exemption for maintaining records for manual gel coat application.

*Comment:* Several commenters requested that sources be allowed to use HAP emissions factors in approved title V permits to estimate HAP emissions. It was noted that the use of such factors will reduce the administrative burden for sources and regulators and will likely improve HAP emissions estimates. One commenter suggested that such factors also be allowed to be used for compliance determinations.

*Response:* We agree with this comment and believe that § 63.5798(a)(1) and (2) of the final rule already allow for the use of facility-specific HAP emissions factors. Section 63.5798(a)(1) states, in part, that "you may use any organic HAP emissions factor approved by us such as factors from the Compilation of Air Pollutant Emissions Factors, Volume I: Stationary Point and Area Sources (AP-42)." Section 63.5798(a)(1) was not intended to limit organic HAP emissions factors only to the AP-42. Paragraph (a)(2) of § 63.5789 allows the development of

facility-specific organic HAP emissions factors through performance testing. If a facility has facility-specific factors that have been approved for use in title V operating permits, then those factors can be used to determine whether or not the facility is a major source under section 112 of the CAA. In addition, a facility can use facility-specific factors for comparison against applicable HAP emissions limits. We have written the language in § 63.5798 of the final rule to clarify the use of such facility-specific factors and have added the provision that such factors must be supported by test data.

*Comment:* One commenter notes that the alternative point values in Table 5 to subpart WWWW of part 63 do not provide a realistic alternative to 95 percent capture and control. In an example calculation for 35 percent styrene resin in open molding, the point value calculation is equivalent to 96 percent control, which is more stringent than the add-on control requirement.

*Response:* While the values may not appear realistic for some facilities, Table 5 to subpart WWWW of part 63 does present the opportunity to meet the final standards using alternative means. We believe that the values in Table 5 to subpart WWWW of part 63 provide incentive to continue to pursue lower-HAP resins and gel coats and other pollution-prevention opportunities and that even if only one facility can use the values, then their inclusion is worthwhile. For these reasons, we have retained Table 5 to subpart WWWW of part 63. However, we have made minor modifications to this table. For process/product groupings where there is an operating facility that currently meets the 95 percent control requirement, we changed the value in Table 5 to subpart WWWW of part 63 to reflect the highest actual calculated HAP emissions factors for operating facilities.

*Comment:* One commenter stated that the weighted average point values should be calculated as a weighted average of resin used. The commenter pointed out that the equation in the current proposal gives equal weight to each month instead of each quantity of resin or gel coat processed. Another commenter asked for clarification on how the "weighted average floor" is calculated.

*Response:* We agree with the commenter that 12-month rolling average point values should be calculated using a weighted average based on the amount of resins, rather than using an average based on monthly values, as was proposed. Therefore, the final rule incorporates the commenters' suggestion. Also, we have changed the