

not meet the 95 percent HAP emissions reduction requirement, which is the new source MACT floor. The CAA does not allow us to be less stringent than the floor. Therefore, we cannot allow preform injection, or direct die injection, to be a compliance option to meet the 95 percent HAP emissions reduction requirement. We also included a definition for preform injection in the final rule that is based on the commenter's suggested language.

*Comment:* Several commenters requested a 12-month averaging period for compliance for pultrusion. The commenters stated that pultruders should be able to use a combination of preform injection, wet area enclosures, direct die injection, and "no control" to meet the 60 percent HAP emissions reduction requirement for existing sources. The commenters pointed out that HAP emissions credits could be earned to offset the processing of products with an open bath and "no control." According to the commenters, without averaging, facilities will be forced to discontinue manufacturing products that require constant open access (for example, certain complex profiles) or to shut down any processing line when there is an extended period of processing adjustments (which require open access to the line).

*Response:* We agree that averaging will add some flexibility for you to comply with the final rule without increasing HAP emissions. Therefore, for existing sources we have included an averaging option. For purposes of averaging, we have assigned wet area enclosures a 60 percent HAP emissions reduction, and direct die injection and preform injection a 90 percent HAP emissions reduction.

*Comment:* Several commenters requested that the 60 percent emission reduction requirement for existing sources, which is based in the use of a wet area enclosure, be replaced with a work practice standard of air flow management. They stated it was impossible to apply wet area enclosures to these large parts because of accessibility concerns. Large parts require almost constant access because they are extremely complex. The other control options for existing sources, preform injection and direct die injection, have also not been demonstrated on these large parts. They suggested a definition for large parts, which was parts with 1,000 or more reinforcements and at least a 60 square inch cross sectional area.

*Response:* We agree that wet area enclosures, which form the basis of the existing source floor, are not feasible for large parts as defined in the comment.

Therefore, we developed a separate existing source MACT floor for large pultruded parts. A review of the available data indicates air flow management (as described in more detail in Table 4 to subpart WWW of part 63) has been used to control emissions from this process group. Therefore, the existing source MACT floor is air flow management. The final rule has been written to reflect the new floor.

*Comment:* Many commenters requested that the limit on wet enclosure open times of 30 minutes per shift be changed to 90 minutes per day to allow for necessary repairs, start-ups, and shutdowns.

*Response:* We evaluated the commenters' request. The facilities that actually set the floor for pultrusion are limited to 30 minutes per 8 hour shift or 45 minutes per 12 hour shift. In addition, the facility may average over all pultrusion lines. We have included averaging provisions across lines in the final rule. We have also allowed a facility to have the doors and covers open 90 minutes per day providing the machine is operated three 8-hour shifts or two 12-hour shifts.

*Comment:* Three commenters claimed that the height restriction on wet area enclosures is not practical because it does not allow room above the highest part to make adjustments to the process or equipment. According to the commenters, the actual height of the wet area enclosure has no impact on HAP emissions because the puller window is the controlling factor, and styrene emissions will remain near the bath without air flow. The commenters, therefore, requested that the restriction be removed.

*Response:* We have no data to suggest that limiting the height of the enclosure affects the amount of HAP emissions reduction. Therefore, we did not include the height restrictions on the wet area enclosures in the final rule.

*Comment:* Commenters requested that capture and control not be required for sources engaged in SMC manufacturing. The commenter stated that EPA's proposal for control is based on one source and, according to the commenter, that source has found that they cannot operate the SMC operation and comply with EPA Method 204 of appendix M of 40 CFR part 51.

A second commenter stated that their SMC operation is permitted by Ohio EPA as a PTE with all HAP emissions vented to a thermal oxidizer. They have found it expensive to maintain the PTE and control device and may be required to install additional monitors at great expense.

*Response:* For existing sources, the final rule does not require capture and control for SMC manufacturing. For new sources, however, the floor is 95 percent reduction and we do not have the flexibility to change the floor. Most of the comments raised by the commenters relate to the cost of PTE and thermal oxidizers. However, costs may not be considered in setting the floor. Additionally, the problems with compliance noted by one commenter do not, in themselves, indicate that new sources cannot be designed and operated to meet the 95 percent control requirement. For example, the facility states that they must open a large overhead door to operate their second SMC machine. In a new facility, the plant layout can be designed where large doors are not required to be continually open. Therefore, the final rule retains the requirement of 95 percent capture and control for SMC manufacturing at new sources that exceed the 100 tpy of HAP emissions threshold.

*Comment:* One commenter noted that an alternative to meeting the 95 percent HAP emissions reduction requirement is provided for some operations and requests that an alternate HAP emissions limit be provided for SMC manufacturing. An alternative HAP emissions limit allows SMC manufacturers to utilize pollution-prevention efforts that have already been implemented and encourages the use of future pollution-prevention efforts.

*Response:* For SMC manufacturing, we have incorporated a HAP emissions limit of 2.4 lb/ton as a compliance alternative to the 95 percent control requirement in the final rule.

*Comment:* A number of commenters expressed concerns about the floor level of control for SMC manufacturing that is based on several work practices. They stated that the requirement to cover doctor boxes should be deleted because the boxes have to be open for machine operators to monitor paste levels. They also mentioned that folding the edges of the SMC had proved to create problems for some facilities that had tried the practice. Finally, they stated that the requirement to enclose the SMC in nylon film should actually say nylon-containing film.

*Response:* We evaluated the basis for the MACT floor by reviewing all of the data available prior to proposal and contained in the public comment letters. On the basis of this review, we discovered that the MACT floor at proposal did not accurately reflect the actual work practices currently being used. Therefore, we changed the floor to