

for both new and existing sources to cover or enclose the resin transport system up to the doctor box and use nylon-containing film to enclose the SMC. Based on the practices at the best controlled similar source, these work practices also apply to new sources that are above the 100 tpy threshold.

*Comment:* Several commenters requested that the requirement for “no visible gaps in mixer covers” be revised to allow reasonable and necessary openings. In general, they stated that mixing vessels must have some opening or vents to allow air to enter or leave the vessel when materials are added or removed, or when the contained material expands or contracts due to changes in temperature. Commenters also noted necessary clearance for mixing shafts and other instrumentation are essential and suggested allowing a gap of one inch. An additional commenter stated that they have several holding tanks that are continuously agitated to prevent settling. They requested that we add clarifying language to the definition of mixers to exclude tanks that are only agitated to prevent settling.

*Response:* Based on our review of the available data on the current industry control on mixing tanks, we found that the proposed rule is more stringent than the floor and that to allow some visible gaps around shafts, etc., is consistent with the data available to set the floor. Therefore, we have written the final rule to allow no more than one inch of visible gap around mixing shafts and any required instrumentation.

With regard to the request to exempt tanks that are agitated only to prevent settling, concern was that the mixing shafts required clearance. Because we have added a provision to allow up to a one inch clearance around the agitator shafts, this concern has been addressed and the suggested exemption for these specific types of mixers is not warranted. Therefore, the final rule does not include an exemption for tanks that agitate only to prevent settling.

*Comment:* Several commenters requested that the rule allow active venting under three conditions: when adding filler; when using nitrogen blanketing; and prior to opening a mixer. Several commenters stated that when powders are added to mixing tanks, vent gases are directed to a dust collector to protect employees. One commenter stated that you cannot capture dust without actively venting. The commenter suggests that the proposed rule allow active venting as part of the material addition process. Two commenters actively vent covered mixers at very low flow through a dust

collector. The active flow results from nitrogen flowing through the air space for safety reasons (to prevent vapor buildup). Based on stack test results, HAP emissions under these conditions were found to be very low (0.000292 lb styrene/lb styrene available). For these reasons, active venting for safety reasons, using an inert gas purge, and at low flow, should be allowed for covered mixers. Another commenter stated that some mixing operations use nitrogen blanketing for safety (to prevent formation of flammable atmospheres). These sources have an incentive to limit use of nitrogen blanketing because of cost; so, HAP emissions will be negligible. Two commenters also requested that the rule allow venting just before adding materials to clear out vapors prior to opening covers and to allow venting just after adding powders to capture residual dust in the vapor space. One commenter also asked that the term “active venting” be defined in the rule.

*Response:* We believe that most HAP emissions that result from mixing operations occur when active mixing is taking place. Also, based on the data used to set the MACT floor, the facilities that responded that mixers have no active venting meant that the mixer was covered and not vented during mixing. As a result, we have written the rule requirement to read “close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.” Because we have removed the term “active venting,” no definition of this term is required.

*Comment:* One commenter believes that covers should be required instead of add-on control for larger mixing operations. According to the commenter, covers can reduce HAP emissions by 84.8 percent to 96 percent. The commenter then maintains that the incremental HAP emissions reduction from oxidation cannot justify the cost and energy use of control when compared to covers. The commenter notes that there are some facilities in EPA’s database that use add-on controls for mixing. However, according to the commenter, the control in all cases is incidental to the use of the add-on control for other operations in the facility. Therefore, the commenter believes that add-on control is not the best control for mixing, and the final rule should require covers instead of add-on controls for all mixing operations.

*Response:* The reasons for why HAP emissions are being controlled is usually not considered in the setting of

MACT standards. Further, we disagree with the commenter’s characterization of the control of mixing HAP emissions as “incidental.” We do not agree that the data provided support the claim of 85 to 96 percent control using covers. Therefore, we have not written the rule as requested by the commenter. New sources that exceed the 100 tpy HAP emissions threshold will still have to cover the mixing tanks and control their HAP emissions from mixing by 95 percent, which is the new source floor level of control.

*Comment:* Two commenters suggested that the definition of compression molding be changed to include a process where resin paste is added to the reinforcement at the press and to include the use of in-mold coating (IMC). According to the commenters, the resin paste process is similar to the use of SMC and BMC because there is no exposure of HAP-containing material, except where the charge is being prepared and placed in the mold. The controls for this process are the same as those available for SMC and BMC (*i.e.* limiting the quantity of exposed materials to that which is required for one press cycle). In-mold coating is a process where HAP-containing materials are mixed with catalyst and then injected into the mold cavity after the molding cycle has started. The IMC reduces the need for post-mold coating (painting) operations. The controls available for IMC are the same as those generally available for mixing operations.

*Response:* We have modified the definition of closed molding to include these processes.

*Comment:* Several commenters requested that the work practice standard requiring closed molding operations to uncover, unwrap, or expose only one charge per mold cycle per machine be revised so that a charge is defined as the amount of materials required to charge the mold(s) for each machine cycle. Some machines have more than one mold, and limiting the amount of material would cause a bottleneck in production capacity. One commenter added that the rule should allow multiple charges to be loaded into the hopper, provided the hopper is kept covered between loading operations and that the unlimited use of slitting machines to unwrap, cut, and prepare charges should be permitted, provided that the charges are then covered or placed in a closed container prior to use at the press.

*Response:* We agree that where multiple charges are required for a single mold cycle, the rule should allow them to be prepared at the same time