

and held in a closed container prior to use. Therefore, we have written the final rule to define "charge" per the commenter's suggestion and to require that multiple charges be kept covered, as for single charges, until used. We have also written the final rule to allow the use of hoppers, robotic loaders, and slitters.

*Comment:* Many commenters noted in the proposed rule that polymer casting mixing operations in containers of 21 gallons or less may be open while active mixing occurs and requested that this exemption be increased. The commenters note that many are using 350 lb containers, which is equivalent to 21.6 gallons. According to the commenters, the mixing process uses an electric mixer and requires frequent manual scraping of the sides, and a requirement to cover the mixer would present a productivity disadvantage.

*Response:* Changing the volume exemption from 21 to 21.6 gallons would be consistent with the intent of the proposed exemption. The surface area of exempt mixers is a more important parameter because it is directly related to the amount of HAP emissions that would occur. Therefore, we have included this exemption in the final rule but have changed the exemption parameter to 500 square inches of surface area. This change should allow the 21.6 gallon mixers, commonly used in this industry, to be exempt from the requirement to cover the mixer.

*Comment:* One commenter noted that worker safety, fire prevention, and product quality requirements necessitate limited active venting of HAP-containing materials storage vessels, covered mixers, and material conveyance enclosures. Some facilities store resins in bulk tanks with passive atmospheric venting. Problems arise from resin contact with the water vapor in the atmosphere. Polymerization occurs on side walls, vents, and transfer pipes. Vents, especially conservation vents, can plug, threatening the tank's structural integrity. Nitrogen blanketing is used by some facilities to solve these problems. Nitrogen blanketing is also used to inert the head space in bulk HAP-containing materials storage tanks for fire prevention.

Another commenter requested clarifying language to allow passive vents for bulk HAP-containing materials storage tanks. The vents are small to allow for breathing of the tanks as they are filled and emptied. These vents are required under OSHA to prevent pressure build-up and to reduce the chances of explosions and major leaks or spills. The annual breathing losses

from all eight of this commenter's tanks are less than 1 tpy. A third commenter suggested that the rule be changed to allow venting from HAP-containing materials storage vessels.

*Response:* We did not intend to prohibit bulk HAP-containing materials storage tanks from venting to the atmosphere for safety. The final rule has been written to clarify this. However, it is not our intent to allow venting from all HAP-containing materials storage vessels because the safety concerns commenters raised are limited to bulk HAP-containing materials storage vessels. Thus, the final rule prohibits venting from HAP-containing materials storage vessels other than bulk storage tanks.

*Comment:* One commenter noted that the proposed rule would require that HAP-containing materials storage containers be kept closed or covered, except when adding or removing materials. The commenter claims this provision is not workable.

*Response:* We believe that covering HAP-containing materials storage containers is a simple and cost-effective way to reduce styrene evaporation. We also note that over 200 facilities that reported information on storage stated that HAP-containing materials storage containers are covered or closed. This provision has been written in the final rule.

*Comment:* Several commenters requested that HAP cleaners be allowed when used in a closed system or covered tank. The reasons were that aggressive cleaners were necessary due to the presence of cured resin on some surfaces, and that it was important to use a cleaner that would not cause contamination problems. They stated that HAP emissions from these closed systems were minimal, and in many cases, the styrene used for cleaning was recycled to the process as a raw material.

*Response:* The proposed rule allowed the use of HAP cleaners to remove cured resin from application equipment because of the difficulty associated with removing the cured resin. One commenter in particular identified other equipment used in the process on which cured resin may occur. We note, as the commenters have, that styrene is the main HAP used in the reinforced plastic composites industry and can be reused in the process without contaminating the end products. Therefore, we believe that the commenters' requests are reasonable and have written the final rule to expand the definition of "application equipment" and to allow the use of HAP-containing cleaners in

closed systems (including covered tanks).

## **VI. Relationship of the Final NESHAP to Other NESHAP and the CAA Operating Permits Program**

### *A. National Emissions Standards for Closed Vent Systems, Control Devices, Recovery Devices, and Routing to a Fuel Gas System or a Process (40 CFR Part 63, Subpart SS)*

If you use an add-on control device(s) to control HAP emissions, you will need to comply with certain provisions in 40 CFR part 63, subpart SS, for add-on controls. The standards in subpart SS, cited by the final Reinforced Plastic Composites NESHAP, are applicable to most sources using an add-on control device. The final Reinforced Plastic Composites NESHAP cite these sections in subpart SS rather than repeating them in the regulatory text.

### *B. NESHAP for Boat Manufacturing (40 CFR Part 63, Subpart VVVV)*

The final NESHAP for Boat Manufacturing were published on August 22, 2001 (66 FR 44218). There is a potential overlap between facilities that produce reinforced plastic composites if they also produce boat hulls, boat decks, or molds for boat hulls and decks. We have included provisions in the Reinforced Plastic Composites NESHAP to clarify where the Reinforced Plastic Composites NESHAP apply, and where the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV) apply.

### *C. NESHAP for Plastic Parts and Products (Surface Coating)*

There are currently NESHAP under development for proposal that will regulate coating of plastic parts and products. The Small Business Advocacy Review Panel, convened for the Reinforced Plastic Composites NESHAP, recommended that we consider the interaction of the Reinforced Plastic Composites NESHAP and the Plastic Parts and Products NESHAP. The Plastic Parts and Products NESHAP may potentially affect facilities that produce reinforced plastic parts and then apply a coating to the finished parts. We have coordinated with this project and have determined that there should be no overlap (*i.e.*, specific operations covered by today's final NESHAP should not also be covered in the Plastic Parts and Products NESHAP). We have not determined any requirements of today's final NESHAP that would overlap, conflict, or cause a duplication of effort.