

March 29, 2006

Dr. Helmy Sultan
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Delivered electronically: hsultan@aqmd.gov

Re: Comments on PAR 1132

Dear Dr. Sultan:

The American Composites Manufacturers Association appreciates this opportunity to provide comments on the District's proposed amendments to Rule 1132 (PAR February 23, 2006) and the associated Draft Staff Report (March 2006). (Our suggested revised or additional text is shown below in *italics*, while suggested deleted text is shown in ~~strikeout~~.)

A. Our comments on the Proposed Amended Rule

1. Section (b)(3) of the proposed amended rule defines COMPOSITE MATERIAL as one which is comprised of "...a gel coat, resin and reinforcement element combined in a thermosetting polymer matrix...." While this definition may capture the composite manufacturing operations likely to be subject to Rule 1132, it is not technically accurate. Many operations considered to be part of the thermoset composites industry do not use reinforcement (cast polymer production, for example), and some may not use gel coat (products not needing a smooth exterior surface can be painted or just left unfinished).

We suggest that COMPOSITE MATERIAL be defined as "*materials used to produce products in polyester resin operations as defined in Rule 1162.*" Rule 1162 provides a more accurate definition, and this revision would make Rule 1132 consistent with the other District rule applicable to composite manufacturing.

2. Section (b)(10) defines NONATOMIZED APPLICATION as "technology in which the resin is not broken into droplets...." This is not correct. The available nonatomized resin application guns, when operated properly, do result in the formation of droplets.

We suggest that this definition be changed to "*NONATOMIZED APPLICATION is nonatomizing spray application as defined in Rule 1162.*" Rule 1162 provides a more accurate definition, and this revision would make Rule 1132 consistent with the other District rule applicable to composite manufacturing.

3. Section (b)(12) should be revised to read "*RESIN is as defined in Rule 1162.*" Rule 1162 provides a more accurate definition, and this revision would make Rule 1132 consistent with the other District rule applicable to composite manufacturing.
4. The new proposed footnote to Attachment A (the UEF emission factor table) should be revised to read: "**Rule 1132 prohibits the use of the Gel Coat Non-Atomized Application emission rates to calculate emissions - use the Gelcoat Application factors instead for all gelcoat spray operations.*" This revision would clarify that, for the purpose of demonstrating compliance with Rule 1132, the factors for atomized gelcoat application should be used for all gelcoat spray operations.

B. Our comments on the Draft Staff Report

1. Section II (page 2) of the draft staff report reads, in part:

The AQMD Gel Coat Testing Program found that in order to obtain the emission reductions anticipated by the UEF table for nonatomized gel coat spray application, the application equipment would have to be operated at pressures that produced an inferior product surface that is not marketable. When nonatomizing application equipment is operated at pressures that produce products that meet composite industry specifications, the application equipment produced essentially the same emissions as conventional application methodology.

We do not disagree with the District's removal of non-atomized gel coat application as a Rule 1132 compliance option at this time, but **we strongly disagree with the conclusion that the equipment is not capable of being operated to produce both lower emissions and acceptable product quality.** This conclusion is not supported by the District's test, which investigated emissions at only a limited range of spray pressures, and evaluated surface quality using laboratory tests that are of unknown predictive ability regarding the performance of actual products. (In addition, the District test suffered from a number of critical analytical and procedural shortcomings, as described in a July 27, 2005 report prepared for ACMA, which we sent to you on August 8.)

Several of our member companies report that, with their combination of substrate, orientation, gel coat properties, and market standard, they are producing quality product using non-atomized gel coat application equipment operated at low pressure.

While the current UEF system lacks a mechanism that ensures that non-atomizing gel coat application equipment is operated at the spray pressures needed to achieve the emission rates shown in the UEF table, ACMA is currently testing equipment to develop enforceable application parameters. The District should leave open the possibility that the industry will develop procedures that will allow sources to satisfy reasonable enforceability requirements while using the equipment to achieve both lower emissions and acceptable product quality.

The subject portion of the Staff Report should be modified as shown:

The AQMD Gel Coat Testing Program found *that when, under the limited conditions of the District test, that in order to obtain the emission reductions anticipated by the UEF table for nonatomized gel coat spray application, the application equipment would have to be operated at pressures that produced an inferior product surface that is not marketable. When nonatomizing application equipment is operated at pressures that produce products that meet composite industry specifications was calibrated to produce the highest possible level of surface quality*, the application equipment produced essentially the same emissions as conventional application methodology.

2. Section VII (page 6) of the report implies that no composite manufacturing operations potentially subject to Rule 1132 use non-atomized gel coat application. We are not sure that the District is justified in drawing this conclusion.

The use of non-atomized gelcoat application is allowed as a compliance option under the US EPA NESHAP for composite manufacturing (40 CFR 63 Subpart WWWW), and sources potentially subject to Rule 1132 are likely to be major sources of styrene and so subject to the NESHAP. In

addition, as noted above, some of our industry members report that they are using non-atomized gelcoat application guns at low pressures, believe that they are achieving the UEF emission rates, and are taking credit for this emission reduction in reports submitted to their permitting authorities and to the US EPA Toxic Release Inventory.

Thank you for considering our comments. Please let me know if you have any questions or if we can provide any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Schweitzer".

John Schweitzer
Senior Director of Government Affairs

(734) 622-0162
jschweitzer@acmanet.org
1010 N. Glebe Rd., Suite 450, Arlington VA 22201