

March 16, 2006

Keith Barnett  
Emissions Standards Division  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711

Delivered electronically: barnett.keith@epa.gov

**Re: Need for Immediate Revisions to the Pultrusion Portion of the Composites MACT Rule, 40 CFR Part 63 Subpart WWWW**

Dear Mr. Barnett,

We have discovered a critical inconsistency in the RPC MACT rule (40 CFR 63 Subpart WWWW) concerning the averaging provisions for pultrusion. Table 3 of the rule requires that pultruders reduce HAP emissions by 60%, and the rule provides that emission reductions may be averaged by resin weight processed across all lines to demonstrate compliance. Per 63.5900(a)(2), these averages must be calculated on a rolling 12-month basis.

Accordingly, compliance cannot be initially determined until 12-months after the effective rule date, which affects due dates for subsequent reporting. That is, compliance and associated reporting deadlines are the same as for open molders who average. But the initial compliance demonstration specified in item 5 of Table 8 does not acknowledge this. This oversight is very critical, because we believe most pultruders justifiably expect they have a year over which to demonstrate initial compliance. The problem is compounded by the fact that the rule does not specify a formula for averaging to be used by pultruders.

To resolve this issue we suggest that three simple changes (*italicized*) be made:

**1. Replace the text in Table 8, item 5(a)(ii) with the following:**

*“you have met the 60% resin-weighted HAP reduction for these operations as calculated using the procedures in §63.5830(e)(2) on a 12-month rolling average one year after the appropriate compliance date.”*

**2. Change §63.5830(e)(2) by modifying the first sentence and adding a new third sentence:**

“The weighted average reduction based on resin throughput of all machines combined *over a 12-month period* is 60%. ... *The following formula shall be used to calculate the rolling 12-month average percent HAP reduction:*

$$R12n = \text{Sum from } i = (n-11) \text{ to } n [(60*Ei + 90*Pi + 90*Di + c*Ci) / (Ei + Pi + Di + Ci + Ui)]$$

*Where:*

*R12n = resin-weighted rolling 12-month average HAP reduction % in month n.*

*Ei, Pi, Di, Ci, and Ui = the pounds of resin processed in month i in lines that employ respectively enclosures, preform injection, direct die injection, controls demonstrating c% HAP reduction, and no reduction.”*

**3. Change Table 13 item 4 (leftmost column) as follows:**

“Is complying with organic HAP emission averaging provisions *or organic HAP emission reduction averaging provisions.*”

We respectfully request that these changes be made before April 21, 2006, to ensure proper implementation and uniform enforcement of the pultrusion averaging provisions and associated reporting requirements.

Sincerely,



John Schweitzer  
Senior Director of Government Affairs

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