

American Composites Manufacturers Association

April 23, 2008

#08-211(APCB) Amendments to 326 IAC 8-1-6
Amy Smith Mail Code 61-50
c/o Administrative Assistant
Rules Development Section
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Via Fax: (317) 233-2342

Dear Ms. Smith:

In June 2006, amendments to 326 IAC 8-1-6 exempted new facilities subject to 326 IAC 20-48 or 326 IAC 20-56 from the requirement to reduce VOC emissions by using BACT under 326 IAC 8-1-6. ACMA supported this change because the NESHAP standards required under 326 IAC 20-48 or 326 IAC 20-56 will be at least as effective in controlling VOC emissions as any reasonable BACT requirement.

For the same reason, we support this new rulemaking, to allow existing facilities that already have a BACT determination under 326 IAC 8-1-6 to request that they be allowed to comply with 326 IAC 20-48 or 326 IAC 20-56, as applicable, in lieu of complying with their existing BACT requirements.

Like the 2006 amendment, this change will increase the efficiency and reduce the costs of IDEM's permitting program for composites manufactures, without any decrease in environmental protection.

Sincerely,



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