

**UEF Advisory**  
Posted August 2, 2006

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**Non-Atomized Application of Highly Filled DCPD Resin**

Data from recent stack tests at tub/shower companies suggest that emissions from the non-atomized application of DCPD resin blends with 50% CaSO<sub>4</sub> are approximately 30% higher than predicted by the non-atomized resin application formula in the current UEF table. A summary of this stack test data, which has been provided to US EPA and some local regulatory agencies, is shown in the table below.

ACMA is planning laboratory tests to better understand the emissions from these materials, and revisions will be made to the UEF as appropriate. In the meantime, open molding companies using non-atomized application with highly filled DCPD resin blends should consider use of the stack test shown in the table below to derive more accurate emission factors for purposes of reporting their annual emissions ( i.e., multiply the emission factor obtained from the UEF table by 1.3 to reflect the 30% increase indicated by the stack test data).

Source Test Results for Non-Atomized Application of Heavily-Filled Resin			
Site (Agency)	Test Date	Styrene Content in Neat Resin (% by wt)	Actual Measured Percentage of UEF factor
MAAX Marion, IA (Linn Co)	4/28/04	33.1%	139%
	4/29/04	33.1%	144%
MAAX Martinsburg, WV (WV DEP)	4/7/05	32.8%	123%
	12/14/05	33.5%	132%
	12/15/05	33.5%	140%
Plant A	12/15/04	42.0%	116%
	12/16/04	42.0%	124%
	6/14/05	42.2%	132%
	6/15/05	42.2%	128%
Plant B	1/11/00	35.0%	124%
	1/12/00	35.0%	130%
<b>Average Percentage = 130%</b>			
non-atomized resin application; heavily filled =>50% by wt			

Note: U.S. EPA has confirmed that sources still have the option of using the emission factors in Table 1 of the Reinforced Plastic Composites NESHAP (MACT rule) for purposes of determining if they are in compliance with the NESHAP emissions limits in Table 3 of the rule.

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**Non-Atomized Application of Gel Coat**

Data from recent tests by ACMA and regulatory agencies suggest that emissions from non-atomized application of gel coat may be significantly influenced by gun design, calibration, and operation.

ACMA is planning laboratory tests to better understand the emissions from this process, and revisions will be made to the UEF as appropriate.

In the meantime, open molding companies using non-atomized application of gel coat should consider contacting their gun supplier to obtain: a) test data showing that the gun is qualified as a non-atomizing gun, and b) the operating and calibration instructions needed to ensure that the gun is operated in such a way that the non-atomizing emissions are achieved in practice. Molding companies should also implement inspection and recordkeeping procedures so that they are able to demonstrate to permitting authorities that the gun calibration and operating instructions have been followed.