

## When do I have to comply?

### If your facility is an existing major source...

- You must comply by April 21, 2006; OR
- You must meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.
- If your facility emits less than 100 tons per year (tpy) of organic HAP from the combination of all centrifugal casting and continuous lamination/casting operations prior to or on April 21, 2003, and then increases emissions to 100 tpy or more from these operations, you must comply with the 95% reduction requirement within 3 years after the semi-annual compliance report indicates that your facility meets or exceeds the 100 tpy threshold.

### If your facility is an existing area source...

- And becomes a major source after April 21, 2003, you must comply within 3 years after your facility becomes a major source.

### If your facility is a new source and...

- It is a major source at startup, you must comply upon startup.
- It becomes a major source, you must comply immediately upon becoming a major source.
- It is initially only subject to the Table 1 or Table 2 limits, and subsequently increases actual organic HAP emissions to a level where the 95% reduction requirement applies, you must comply with the 95% reduction requirement (or the 95% requirement limit alternatives) within 3 years after the semi-annual compliance report indicates that your facility meets or exceeds the 100 tpy threshold.
- You use add-on controls to initially comply, you must demonstrate compliance within 180 days after start-up.

### If your facility is using averaging to comply...

- You must initiate collection of required data on the compliance date (April 21, 2006, for existing sources, start-up for new sources) and demonstrate compliance 1 year later (April 21, 2007, for existing sources, 1 year after start-up for new sources).

## Is my facility a major source or an area source?

### It is a major source of HAP if...

- Your facility emits or has a potential to emit (considering controls) 10 tons per year or more of any single HAP or 25 tons per year or more of any combination of HAP.

### It is an area source of HAP if...

- It is not a major source.

If you have a reinforced plastic composites operation, you may be affected by EPA air emission standards that were promulgated on April 21, 2003 [68 FR 19402]. This rule establishes requirements for organic hazardous air pollutants (HAP).

## For More Information

Copies of the rule and associated materials are located at EPA's Reinforced Plastic Composites Production web site:

<http://www.epa.gov/ttn/atw/rpc/rpcpg.html>

You can also contact your regional EPA air toxics office as shown below:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	<a href="http://www.epa.gov/region1">www.epa.gov/region1</a> (888) 372-7341
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR	<a href="http://www.epa.gov/region2">www.epa.gov/region2</a> (212) 637-3000
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	<a href="http://www.epa.gov/region3">www.epa.gov/region3</a> (800) 438-2474 (215) 814-3297
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104	FL, NC, SC, KY, TN, GA, AL, MS	<a href="http://www.epa.gov/region4">www.epa.gov/region4</a> (800) 241-1754
Region 5 77 W. Jackson Blvd Chicago, IL 60604	IL, IN, MI, WI, MN, OH	<a href="http://www.epa.gov/region5">www.epa.gov/region5</a> (800) 621-8431
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202	AR, LA, NM, OK, TX	<a href="http://www.epa.gov/region6">www.epa.gov/region6</a> (800) 887-6063 * (214) 665-6444
Region 7 901 N. 5 <sup>th</sup> Street Kansas City, KS 66101	IA, KS, MO, NE	<a href="http://www.epa.gov/region7">www.epa.gov/region7</a> (800) 223-0425
Region 8 999-18th St. Suite 300 Denver, CO 80202-2466	CO, MT, ND, SD, UT, WY	<a href="http://www.epa.gov/region8">www.epa.gov/region8</a> (800) 227-8917 * (303) 312-6312
Region 9 75 Hawthorne St., San Francisco, CA 94105	CA, AZ, HI, NV	<a href="http://www.epa.gov/region9">www.epa.gov/region9</a> (415) 947-8000
Region 10 1200 6 <sup>th</sup> Avenue Seattle, WA 98101	AK, ID, WA, OR	<a href="http://www.epa.gov/region10">www.epa.gov/region10</a> (800) 424-4372 * (206) 553-1200

\* For sources within the region, only.

United States  
Environmental Protection  
Agency  
<http://www.epa.gov/ttn/atw/rpc/rpcpg.html>

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Office of Air Quality Planning & Standards (E143-02)



# REINFORCED PLASTICS COMPOSITES PRODUCTION NESHAP 40 CFR 63 SUBPART WWW

## AN OVERVIEW OF THE FINAL RULE

### Reinforced plastic composites production is . . .

Limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene. Cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites are also included.

## Am I subject to the rule?

### You are subject to the rule if...

- You own or operate a reinforced or non-reinforced plastic composites production facility that is located at a major source of HAP emissions and that uses thermoset resins and/or gel coats that contain styrene.

### You are exempted from the rule if...

- Your facility is an area source.
- Your facility only repairs reinforced plastic composites.
- Your facility is a research and development facility as defined in the Clean Air Act.
- Your reinforced plastic composites operations use less than 1.2 tpy combined of thermoset resins and gel coats that contain styrene.

### If you manufacture fiberglass boats or boat parts...

- You are not subject to this rule if all the reinforced plastic composites you manufacture are used in your boats. You are subject to the Boat Manufacturing NESHAP (40 CFR 63 Subpart VVVV).
- If you meet the applicability criteria of this rule and the Boat Manufacturing NESHAP, operations associated with the manufacture of composites that are not used in fiberglass boats are subject to this rule.
- Facilities potentially subject to this rule and the Boat Manufacturing NESHAP may elect to have all operations covered by the Boat Manufacturing NESHAP if HAP emissions will not increase as a result.
- Facilities that make boat parts but are not subject to the Boat Manufacturing NESHAP are subject to this rule if they meet this rule's applicability requirements.

## Am I a new or existing source?

### You are a new source if...

- Construction commenced after August 2, 2001 AND no other reinforced plastics composites affected source existed at the site when construction commenced.

### You are an existing source if...

- You do not meet the criteria for a new source.

## What do I have to do?

- Comply with emission limits (see Table 1), HAP content limits, or emission reduction requirements as applicable. You may use emissions averaging.
- Comply with work practices (see Table 2).
- Keep records.
- Submit notifications and reports.
- Certain operations are excluded (e.g., non-gel coat surface coating, application of mold sealing agents).

## What if I am an existing source?

- If your source has no centrifugal casting or continuous lamination/casting operations, you must comply with the emission limits in Table 1 below.
- If your source does have centrifugal casting and/or continuous lamination/casting operations but the combined emissions from these operations are less than 100 tpy, you must comply with the emission limits in Table 1 below.
- If your source emits 100 tpy or more from the combination of all centrifugal casting and/or continuous lamination/casting operations, you must reduce the emissions from these operations by at least 95% and you must meet the emission limits in Table 1 below for all other operations.
- Certain operations for which specific requirements are not listed, such as polymer casting and resin transfer molding, do not have emission limits but are still subject to MACT and must comply with all applicable requirements, such as notification requirements.

## What if I am a new source?

- If your source emits less than 100 tpy from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must comply with the emission limits in Table 1 below.
- If your source emits 100 tpy or more from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must reduce the emissions from those operations by 95%.
- Open molding and pultrusion operations for certain large parts are exempt from the 95% reduction requirement but must comply with emission limits and additional work practice requirements.

**Table 1. Emission Limits for Existing Sources and for New Sources Emitting Less Than 100 TPY**

Type of Material and/or Application	Limits by Type of Operation (lb/ton)						
	Mechanical	Filament	Manual	Centrifugal Casting	Gelcoat	Continuous Lamination/Casting	Pultrusion
Corrosion-Resistant and/or High Strength	112	171	123	25	605	--	--
Non-Corrosion-Resistant and/or Non-High Strength	87	188	87	20	--	--	--
Tooling	254	--	157	--	437	--	--
Low-Flame/Low-Smoke Resin	497	270	238	--	854	--	--
Shrinkage Control	354	215	180	--	--	--	--
White/Off-white pigmented gel coat	--	--	--	--	267	--	--
All other pigmented gel coat	--	--	--	--	377	--	--
Clear gel coat	--	--	--	--	522	--	--
All resins	--	--	--	--	--	15.7 lb/ton OR 58.5% reduction	60% reduction

**Table 2. Work Practice Standards (Existing and New Sources)**

Operation	Requirement
Compression/injection molding	Uncover only one charge per mold cycle per machine. One charge means sufficient material to fill all molds for multiple-mold machines or to fill the hopper for hopper-fed machines.
Cleaners	Use non-HAP containing cleaners, except styrene can be used to clean closed systems and organic HAP cleaners can be used to clean cured resin from application equipment.
Containers	Keep closed when storing HAP-containing materials.
Mixing/BMC manufacturing	Use covers with no visible gaps except for up to 1 inch around mixing shafts and instrumentation. Close mixer vents that are not vented to a 95 percent (or more) efficient control device when mixing (except when adding materials or as needed for safety reasons).
SMC manufacturing	Enclose resin delivery system to the doctor box and use nylon-containing film to wrap SMC.
Pultrusion (large parts)	Reduce air velocity; limit ambient air across wet-out area; no point suction of ambient air (unless directed to a control device); cover vessels containing HAP-containing materials.