112(g) Case-By-Case Maximum Achievable Control Technology Determination
Review of Decostar Industries, Incorporated
Construction/Operation of a Facility to Manufacture Plastic Automobile Components
Located in Carrollton, Georgia (Carroll County)

NOTICE OF MACT APPROVAL

SIP Permit Application No. 14192
July 2003

Reviewing Authority

State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch
Stationary Source Permitting Program (SSPP)

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1.0 EXECUTIVE SUMMARY

Decostar Industries, Incorporated (Decostar) has applied for an air quality permit to construct and operate a facility to manufacture various plastic automobile components, such as bumper fascia. The facility is to be located in Carrollton, Georgia, in Carroll County.

The facility will consist of various plastic molding and surface coating operations. The surface coating operations and associated solvent cleaning will be the primary source of emissions. The primary pollutants of concern are volatile organic compounds (VOC) and hazardous air pollutants (HAP). Potential emissions of both of these pollutants are above the major source thresholds.

Carroll County has been designated by the U.S. Environmental Protection Agency (EPA) as attainment or unclassified for all criteria pollutants. However, the Director of the EPD has designated Carroll County as a county that contributes to the ambient concentrations of ground level ozone in the Atlanta Non-attainment Area. New stationary sources that have the potential to emit more than 100 tons per year of VOC in Carroll County are required to undergo a case-by-case BACT-level control determination and obtain emission offsets for any residual, uncontrolled VOC emissions. Decostar has requested a limit on VOC emissions of 100 tons per year in order to avoid these permitting requirements.

Under 40 CFR 63 Subpart A, Decostar will be a major source of HAP emissions because, even with permit limits, it will have the potential to emit more than 10 tons per year of any individual HAP or 25 tons per year of any combination of HAPs. As a newly constructed major source of HAPs without a promulgated Part 63 National Emission Standard for Hazardous Air Pollutants (NESHAP), this facility is subject to a case-by-case Maximum Achievable Control Technology (MACT) determination pursuant to Section 112(g) of the Clean Air Act Amendments of 1990.

Decostar is part of an industry category for surface coating of plastic parts, for which the U.S. EPA has proposed a MACT standard called "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts & Products" (Plastic Parts Coating NESHAP), which was posted in the Federal Register on December 4, 2002. Because this NESHAP has not been promulgated at the time of permit issuance, the Decostar facility is subject to the case-by-case MACT-level control technology review under Section 112(g) of the 1990 Clean Air Act Amendments. The requirements for such case-by-case control technology reviews are codified in 40 CFR Part 63, Subpart B and adopted by reference, with a few revisions and clarifications, into the Georgia Rules for Air Quality Control.

To satisfy the 112(g) case-by-case MACT requirements (40 CFR 63.40 through 63.44, Control Technology Requirements in Accordance with Section 112(g)(2)(B) of the 1990 Clean Air Act Amendments), the Division has allowed facilities to adopt proposed NESHAPs. In order to fulfill these requirements,

Decostar has requested emission limits for HAP and VOC and will adopt the emission and work practice standards established in the proposed NESHAP, 40 CFR Part 63, Subpart PPPP, "Surface Coating of Plastic Parts and Products," and 40 CFR Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters." Decostar proposes to comply with the above-mentioned emission limits and the emission standards of the proposed Subpart PPPP by utilizing water-borne basecoats where possible and by abating VOC and HAP emissions via thermal oxidation. Decostar proposes to comply with the emission standards of Subpart DDDDD by burning only natural gas at the facility.

Decostar will be subject to the Title V operating permit program because actual and potential emissions of HAPs will exceed the major source thresholds for this class of pollutants. Decostar must submit an application for a Title V permit within one year of commencing operations at the Carrollton facility.

2.0 APPLICATION INFORMATION

The permit application includes: an air quality permit application with process descriptions and an emissions inventory, 112(g) requirements. A toxic impact assessment was performed and included with the application. The toxic emissions impact from the construction and operation of the proposed facility is expected to be insignificant.

2.1 Applicant Name and Address

Decostar Industries, Inc.
1 Decoma Drive
Carrollton, Georgia 30117
Carroll County

2.2 Authorized Representative

John Mulrooney,
General Manager

2.2 Application Submittals

December 18, 2002	Date of initial SIP application and case-by-case MACT determination, assigned Application No. 14192.
December 23, 2002	Date initial SIP application and case-by-case MACT determination were received by EPD.
January 16, 2003	Date of SIP application acknowledgement correspondence from EPD to Decostar.
February 7, 2003	toxic impact assessment.
February 20, 2003	Date revised case-by-case MACT determination received by EPD.

3.0 BACKGROUND

The permit application and subsequent submittals include: an air quality permit application with process descriptions and an emissions inventory and required elements of the 112(g) case-by-case MACT determination. A toxic impact assessment was performed and included with the application. The toxic emissions impact from the construction and operation of the proposed facility is expected to be insignificant.

3.1 Facility Location

The Decostar facility is to be located in Carrollton, in Carroll County, Georgia. Carroll County has been designated by the US EPA as attainment or unclassified for all criteria pollutants. Under 40 CFR 63.2, National Emission Standards for Hazardous Air Pollutants – General Provisions, Decostar is a major source for HAP emissions and is subject to permitting requirements as defined by this subpart.

3.2 Permit Status of Facility Operations

As a new facility, the proposed Decostar plant does not have any pre-existing air quality permits. The facility intends to begin operations in the Summer of 2003. The company will be required to submit a complete Title V application within twelve (12) months after the date that production operations commence at the Carrollton facility.

3.3 Project Schedule

Construction on the proposed plant will be complete in August 2003, and regular production operations are scheduled to commence in September 2004.

3.3 Proposed Operation

Decostar intends to construct and operate a facility to manufacture various automobile components. The components to be manufactured will be unassembled and assembled plastic parts, and the primary operations at the facility will include plastic molding and surface coating of plastic parts. The plant will operate 24 hours per day, six days per week, 52 weeks per year for a total annual operating period of 7488 hours.

3.4 Estimated Emissions

The table below lists potential and projected actual emissions of criteria pollutants and HAPs from the entire facility. The applicant did not provide potential emissions calculations in the permit application; therefore, the potential emissions

presented in the table below are based on projected actual emissions multiplied by a productivity factor that includes a ratio of 8760 hours per year potential to operate over 7488 hours per year actual operations and an assumed 90 percent production efficiency factor stated in the application. HAP_i emissions indicates the emissions of the individual HAP that is emitted in the greatest quantity; HAP_t indicates aggregate HAP emissions.

Pollutant	Potential Emissions (tpy)	Permit Limits (tpy)	Actual Emissions (tpy)
VOC	3060	100	94.1
HAP_i*	704	----	28.2
HAP_t	1760	----	56.8
NOx	27.4	----	21.1
CO	32.4	----	24.9
PM_{10}	11.6	----	8.90
SO_2	0.144	----	0.111
Pb	----	----	----

*Ethylene Glycol Monobutyl Ether is the most prevalent HAP.

4. PROCESS DESCRIPTION

4.1 Plastic Molding Operations

Automobile components will be produced by two parallel processes: injection molding (IM) and reactive injection molding (RIM). In the injection molding process, thermoplastic olefins are heated to make them pliable and then injected into closed molds and allowed to cool. Once cooled, these plastics retain the shape of the mold and are sent to the paint line.

Reactive injection molding involves the addition of pre-polymer resins and a catalyst agent into closed molds. Once the polymerization reaction has taken place, the components are cured in the RIM oven, allowed to cool, and then sent to the paint line.

Production rates of IM plastics and RIM plastics at the proposed Decostar facility will be approximately 2600 and 7000 tons per year, respectively. The IM and RIM operations emit virtually no pollutants in and of themselves due to the lack of low-molecular weight / high volatility solvents in the plastics being molded and the closed nature of the molds, which inhibits evaporative losses. The primary source of emissions from these operations will be VOC and HAP from solvents used to clean the molds and other tools used in these processes. Trace amounts of the methylene diisocyanate (MDI) catalyst used in the RIM molding operations will also be emitted.

4.2 Surface Coating of Plastic Parts

Plastic parts from the molding operations must be painted to match the colors of the automobiles on which they will eventually be assembled. Traditionally, the surface coating of these fascia parts (especially those made of plastic) requires the use of adhesion promoters, prime coatings, and topcoats, all of which are characterized by high organic solvent contents. The topcoat system typically consists of a basecoat and a clearcoat.

Prior to being coated, the plastic parts from the molding operations will be sent through a five stage Citric Acid wash in order to remove any contaminants that might interfere with adhesion between the various surface coatings and the plastic substrates. After cleaning and prior to any surface coating operations, the plastic parts pass through a de-watering oven (Source Code DW) with two drying zones rated at 2.0 MM BTU/hr each.

Following the parts cleaning operations, the molded plastic parts pass through a number of surface coating operations with intermediate flash-off and curing stages. The first of these surface coating operations is the application of an adhesion promoter/primer, which is a solvent application that temporarily alters the physical properties of the plastic substrates in order to enhance adhesion between the plastic surfaces and the subsequent prime coat application. Decostar

will apply the adhesion promoter/primer in a single paint spray booth (Source Code AP1). Due to the nature of the plastics used by Decostar and the properties required of their finished products, the company is not able to use water-borne adhesion promoters.

Parts leaving the adhesion promoter/primer spray booth, the plastic parts will pass through a flash-off zone to remove residual adhesion promoter/primer solvents. Parts then pass through a curing oven (Source Code PO) with four curing zones, each rated at 2.5 MM BTU/hr. As with the adhesion promoter, the prime coat utilizes a solvent-borne formulation.

The final stage in the surface coating process is the application of the topcoat system, which consists of separate applications of a basecoat and a clearcoat. The basecoat will be applied in a series of three parallel paint spray booths (Source Codes BC1 – BC3). Prior to proceeding to the clear coat booths, the parts will pass through dewatering oven (Source Code DW) that consists of two drying zones, each rated at 2.0 MM BTU/hr. Decostar anticipates that approximately 25 percent of the basecoat consumed will be based on a water-borne formulation, although the actual mix of water-borne versus solvent-borne base coats applied will be a function of customer demand.

The last step in the surface coating operations is the addition of the clear coat, which will be based on a solvent-borne formulation. The clear coat will be applied in one of two parallel paint spray booths (Source Codes CC1 & CC2) and will be cured in a single bake oven (Source Code BO) consisting of three heated zones, each rated at 4.0 MM BTU/hr.

The primary emissions from the various surface coating operations will be VOC and HAP emissions resulting from the evaporative loss of solvents contained in the coatings and particulate matter resulting from the paint overspray. NOx, SO_2, and CO resulting from fossil fuel combustion in the flash-off and curing ovens that follow the surface coating applications will also be emitted. The applicant proposes to reduce VOC and HAP emissions from the surface coating operations by the following methods:

- The use of best management techniques to limit evaporative loss of solvents, such as storing solvent-laden materials in closed containers;

- The use of a low-solvent, water-borne formulation in approximately 25 percent of the base coat applied to plastic parts; and

- The capture and abatement of VOC and HAP emissions from the coating operations. Emissions from all stages of the coating operation, from the dryoff oven application of the adhesion promoter to the bake oven for the clear coat, will be routed to a regenerative thermal oxidizer. The spray booth, flash-off and curing stages will all take place in enclosures that

meet the criteria for permanent total enclosures in order to ensure 100 percent capture. The oxidizer will achieve a minimum destruction efficiency of 96 percent.

Emissions of particulate matter from paint overspray will be controlled via a wet-orifice scrubbing system installed in each paint spray booth. This type of overspray control is very common in automobile spray coating operations and achieves good control efficiencies in practice.

4.3 Utilities and Support Operations

Operations and utilities that support the production activities will consist of a "paint kitchen" where the various coatings are mixed and prepared, a hot water heater (Source Code HW1) rated at 21 MM BTU/hr, 18 air handling units rated at 1.0 MM BTU/hr each, 11 comfort heaters rated at less than 1.0 MM BTU/hr each, and a tank farm to store raw materials and waste generated from the manufacturing processes.

The combustion of fossil fuels from the hot water heater, air handling units and comfort heaters will generate emissions of NOx, CO, PM and SO_2. Because these units will be fired with natural gas, emissions of SO_2 and PM will be negligible.

The tank farm will consist of the following tanks:

- Two solvent purge tanks (Source Codes B1 & B3), each with 8100 gallon capacity;
- Two waste solvent tanks (Source Codes B2 & B4), each with 8100 gallon capacities;
- One conservation vent (Source Code CV1) linked with up to 5 solvent storage tanks at a 350 gallon capacity each;
- One conservation vent (Source Code CV2) linked with up to10 paint storage tanks at a 250 gallon capacity each;
- Eight conservation vents (Source Codes CV3 – CV10) linked with up to 20 paint storage tanks per vent at an 80 gallon capacity each; and
- Six TPO plastic pellet storage tanks (Source Code M1) with 154,000 pound capacity each.

Other raw materials used in the production of automobile parts will be received and stored in totes and 55-gallon drums. Emissions from the paint kitchen, tank farm and other raw material storage will consist primarily of evaporative losses of VOC and HAP from the solvents in the materials being stored, however all

emission from the kitchen will be captured and abated. These emissions will be negligible, relative to the primary sources of VOC and HAP emissions in the surface coating operations. The tanks will be equipped with conservation vents and, in some cases, submerged fill pipes in order to reduce these evaporative losses.

4.4 Emission Controls

Plastic Molding Operations:

The primary emissions from the plastic parts molding operations will be in the form of evaporative losses of VOC and HAP from the solvents used to clean the molds and tools used in production. Trace amounts of MDI, which is used as a catalyst in the RIM molding operations, will also be emitted. Decostar proposes to reduce emissions from evaporative losses of the cleaning solvents by storing the raw and spent solvents, as well as solvent-laden cleaning materials, in closed containers. Emissions of MDI from the RIM molding process will be minimized by the use of closed molds to inhibit evaporative losses.

Cleaning and Surface Preparation:

Emissions from the cleaning operation that precedes surface coating will mainly be in the form of VOC and some HAP from evaporative loss of the cleaning solvents. The primary solvent to be used in the surface prepping operation is isopropanol. Decostar proposes to reduce these evaporative emissions by storing the raw and spent solvents, as well as any solvent-laden materials, in closed containers.

Combustion emissions will also result from the drying ovens associated with the cleaning operations. These emissions will not be abated, but will be subject to Rules (b) and (g).

Surface Coating Operations:

The surface coating operations constitute the greatest source of emissions at the plant. The primary pollutants emitted by these operations are VOC and HAP resulting from evaporative loss of solvents contained in the paints and the solvents used to clean the paint booths and application equipment. Decostar will reduce these VOC and HAP emissions by employing electrostatic bells with the conventional gun spray equipment as coating technology to improve transfer efficiency, utilizing a low-solvent, water-borne formulation in approximately 25 percent of the basecoat consumed, and by abating VOC and HAP emissions by thermal oxidation.

Despite the transfer efficiency of the conventional gun spray equipment operated with electrostatic bells, some paint overspray will still occur. The particulate

matter emissions from this paint overspray will be controlled by a wet orifice scrubbing system installed in each of the paint spray booths.

The various natural gas-fired flash-off and curing ovens will produce some combustion emissions, which will be not abated. These combustion units, however, will be subject to the emission standards of Rules (b) and (g).

Support Operations and Utilities:

The hot water heater, air handling units and comfort heaters will produce combustion emissions of NOx, CO, SO_2 and PM. Due to their relatively low emission rates, these pollutants will not abated. However, the emissions from these units will be subject to the emission standards of Rules (b), (d) and (g). Decostar is proposing to minimize emissions of HAPs from these sources by utilizing natural gas as the primary fuel for these units.

The paint kitchen, tank farm and other raw material storage at the facility will produce some VOC and HAP emissions from evaporative losses of solvents. The paint kitchen is an enclosed room that will have ducts routing emissions to the thermal oxidizers. These losses will be minimized by standard best management practices, which will include keeping containers closed when not in use, conservation vents on tanks storing volatile materials, and submerged fill pipes on storage tanks of volatile materials with capacities in excess of 4,000 gallons.

5. REVIEW OF APPLICABLE RULES AND REGULATIONS

5.1 Applicable Rules and Emission Standards

Georgia Rule 391-3-1-.03(1)
Applicability: Georgia Rule 391-3-1-.03(1) requires that any person prior to beginning the construction or modification of any facility which may result in air pollution shall obtain a permit for the construction or modification of such facility from the Director upon a determination by the Director that the facility can reasonably be expected to comply with all the provisions of the Act and the rules and regulations promulgated thereunder.

Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions
Applicability: Georgia Rule 391-3-1-.02(2)(b) [a.k.a Georgia Rule (b)] is an applicable standard for visible emissions from all production operations at the proposed Decostar facility, except for those that are regulated by the opacity standard of Georgia Rule (d).

Emission Standard: Georgia Rule (b) limits visible emissions to less than forty (40) percent opacity from affected units. The primary source of visible emissions from the operations at Decostar will be spray application of surface coatings in the various paint spray booths. These emissions will be controlled via the wet orifice scrubbing systems installed in each of the paint spray booths.

Georgia Rule 391-3-1-.02(2)(d) – Fuel Burning Equipment
Applicability: Georgia Rule 391-3-1-.02(2)(d) [a.k.a Georgia Rule (d)] is an applicable requirement that contains emission standards for particulate matter and visible emissions for the hot water generator that Decostar proposes to install.

Emission Standard: The allowable particulate matter emission rate for the hot water generator under Rule (d) is $0.5(10/R)^{0.5}$ in accordance with Georgia Rule (d)2(ii). The allowable opacity limit for said unit is twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity in accordance with Georgia Rule (d)3. The NOx emission standard of Rule (d)4 does not apply to the hot water heater because its maximum rated heat input capacity is less than 250 million BTUs per hour. Because Decostar will fire the hot water heater with natural gas, exceedances of the particulate matter and opacity standards of Rule (d) are not expected to occur.

Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes
Applicability: Georgia Rule 391-3-1-.02(2)(e) [a.k.a Georgia Rule (e)] is an applicable requirement that contains emission standards for particulate matter from manufacturing processes not subject to any more stringent PM emission standards. This standard will apply to PM emissions from the surface coating operations at the proposed Decostar plant. The only other significant source of

PM emissions at the facility, the hot water heater, will be regulated under Georgia Rule (d).

Emission Standard: The allowable particulate matter emission rate for the various surface coating operations under Rule (e) is equal to 4.1 multiplied by the process input rate, expressed in tons per hour, to the power of 0.67 [$E = 4.1*P^{0.67}$] in accordance with Georgia Rule (e)1(ii). Each of the paint spray booths at the Decostar facility will be equipped with a wet orifice scrubbing system in order to control paint overspray; therefore it is not anticipated that the painting operations will exceed the particulate matter standard of Rule (e).

Georgia Rule 391-3-1-.02(2)(g) – Sulphur Dioxide

Applicability: Georgia Rule 391-3-1-.02(2)(g) [a.k.a Georgia Rule (g)] is an applicable requirement that contains emission standards for sulfur dioxide from fuel burning sources. Affected sources at the proposed Decostar facility include all combustion equipment, including the hot water heater, the air handling units, the comfort heaters, and the various flash-off and curing ovens in the paint shop.

Emission Standard: Because all of the combustion-related equipment listed above is rated at less than 100 million BTUs per hour maximum heat input capacity, Georgia Rule (g) limits SO_2 from these sources by imposing a limit on the sulfur content of the fuels burned in them of 2.5 percent by weight in accordance with Georgia Rule (g)2. The natural gas fuel supply that Decostar will use to fire the affected emission sources inherently complies with this fuel sulfur limit; therefore it is highly unlikely that any exceedances of the Rule (g) standard will occur.

Georgia Rule 391-3-1-.02(2)(lll) – NOx Emissions from Fuel-Burning Equipment

Applicability: Georgia Rule 391-3-1-.02(2)(lll) [a.k.a Georgia Rule (lll)] is an applicable requirement that contains emission standards for NOx any fuel-burning equipment with a maximum design heat input capacity equal to or greater than 10 million BTUs per hour and less than or equal to 250 million BTUs per hour. The only affected source at the proposed Decostar plant will be the hot water generator, which is rated at 21 million BTUs per hour.

Emission Standard: Georgia Rule (lll) limits the NOx emissions during the ozone season to not more than 30 parts per million (ppm) at three (3) percent oxygen, on a dry basis.

40 CFR 60 Subparts A & Dc – General Provisions and Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Applicability: New Source Performance Standard (NSPS) Subpart Dc contains requirements to reduce emissions from the combustion of fossil fuels in process equipment used to produce steam or heat water. The only affected unit at the proposed Decostar facility is the hot water heater (Source Code HW1).

Emission Standard: Because the hot water heater will only be fired with natural gas, the only applicable requirement of NSPS Subpart Dc is a requirement to monitor and record natural gas consumption. The required monitoring frequency expressed in the Rule text is daily; however, U.S. EPA has issued guidance that sources that burn only natural gas and distillate fuel oil may reduce the frequency of the monitoring to monthly. Some notification requirements also apply.

40 CFR 63 Subparts A & B – General Provisions and Case-By-Case MACT Review Under Section 112(g) of the Clean Air Amendments of 1990

Applicability: Because the proposed Decostar facility will be a new, major source of HAP emissions for which a MACT standard has not been promulgated (and which is not part of a de-listed source category), the operations at the facility must undergo a case-by-case MACT review pursuant to Section 112(g) of the 1990 Clean Air Act Amendments and the associated federal and state regulations that implement the 112(g) requirements, found at 40 CFR Par 63, Subpart B and the Georgia Rules for Air Quality Control at 391-3-1-.02(9)16, respectively.

Emission Standard: 112(g) requires the case-by-case review and application of new source MACT-level controls. Decostar has proposed as MACT for their operations the draft MACT standards for Surface Coating of Plastic Parts and Products and Industrial, Commercial and Institutional Boilers and Process Heaters, which have been proposed by the U.S. EPA and are currently undergoing public comment.

Decostar proposes to comply with the emission standards of the proposed 40 CFR Part 63, Subpart PPPP, MACT standard for Surface Coating of Plastic Parts and Products via pollution prevention and abatement technologies. The company will utilize low-solvent, water-borne formulations in approximately 25 percent of the basecoat applied to plastic parts and abate HAP emissions from the entire surface coating line through regenerative thermal oxidation in order to meet the limits in the proposed plastic parts NESHAP. Further reductions in HAP emissions from surface coating and associated cleaning operations will be realized by the use of HVLP spray application techniques and standard best-management practices to reduce evaporative losses of solvents in cleaning solutions and coatings.

Decostar proposed to comply with the emission standards of the proposed 40 CFR Part 63, Subpart DDDDD, MACT standard for Industrial, Commercial and Institutional Boilers and Process Heaters by limiting fuel use in the hot water generator to natural gas. The hot water heater being installed by Decostar would be classified as a new, large liquid-fired unit under the proposed rule and would be subject to certain emission limits for particulate matter, hydrogen chloride and carbon monoxide (although carbon monoxide is not a HAP, it is being used as a surrogate for HAP emissions in the proposed NESHAP). However, the Decostar hot water heater, because it will burn only natural gas and NOT residual oil, will not be subject to any performance testing requirements. The only requirements of the proposed NESHAP that will apply to the Decostar hot water heater are the

requirements for initial notification and certification of the types of fuels utilized in the unit. For this reason, Decostar is proposing to use natural gas only. Certification that all fuel use is natural gas and record-keeping requirements on the amount of fuel used will demonstrate compliance with the MACT standard and state rules (d) and (g).

5.2 Permitting Rules and Emission Standards That Do Not Apply

The following discussion pertains to air quality standards and permitting requirements that were evaluated for applicability to the proposed Decostar facility and were determined not to be applicable.

Georgia Rule 391-3-1-.02(7) – Prevention of Significant Deterioration (PSD)
Applicability and Emission Standards: Georgia Rule 391-3-1-.02(7) adopts by reference 40 CFR 52.21. The federal PSD permitting requirements and associated emission standards do not apply to the proposed Decostar facility because the potential emissions of all criteria pollutants, after controls and enforceable permit limits, will be below the corresponding applicability thresholds for PSD review.

Georgia Rule 391-3-1-.03(8)(c)14 – Additional Provisions for Areas Contributing to the Ambient Air Level of Ozone in the Metropolitan Atlanta Ozone Nonattainment Area
Applicability and Emission Standards: Georgia Rule 391-3-1-.03(8)(c)14 requires case-by-case BACT-level emission controls on major sources of VOC in areas that the Director of the EPD has designated as contributing areas to the Atlanta Ozone Non-attainment Area. The Director has designated Carroll County as one such contributing area. However, the proposed Decostar facility will not be subject to the emission standard and offset requirements of this Rule because the facility-wide VOC emission limit of 100 tons per year is less than the applicability threshold for the Rule.

Georgia Rule 391-3-1-.02(2)(t) – VOC Emissions from Automobile and Light-Duty Truck Manufacturing
Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(t) [a.k.a Georgia Rule (t)] is an applicable requirement that contains emission standards for VOC from various surface coating and cleaning operations at automobile and light-duty truck manufacturing facilities. The proposed Decostar facility will not be subject to Georgia Rule (t) because it is not a "manufacturing plant" as defined by the Rule and because facility-wide VOC emissions will be limited to less than the applicability threshold of 100 tons per year.

Georgia Rule 391-3-1-.02(2)(ff) – Solvent Metal Cleaning
Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(ff) [a.k.a Georgia Rule (ff)] is an applicable requirement that contains VOC emission standards for solvent metal cleaning operations. This Rule does not apply to the proposed Decostar facility because it VOC emissions from solvent metal cleaning

operations across the entire plant will be less than the applicability threshold of 100 tons per year.

Georgia Rule 391-3-1-.02(2)(ii) – VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products

Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(ii) [a.k.a Georgia Rule (ii)] is an applicable requirement that contains emission standards for VOC from surface coating of miscellaneous metal parts and products. The proposed Decostar facility will not be subject to Georgia Rule (ii) because it does not conduct any metal surface coating operations and because facility-wide VOC emissions will be less than the applicability threshold of 100 tons per year.

Georgia Rule 391-3-1-.02(2)(tt) – VOC Emissions from Major Sources

Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(tt) [a.k.a Georgia Rule (tt)] requires a case-by-case RACT-level control technology review for any operations that are not regulated by a more specific VOC RACT standard under the Georgia Rules for Air Quality Control. The proposed Decostar facility will not be subject to Georgia Rule (tt) because potential facility-wide VOC emissions, under the enforceable VOC emissions limit, will be less than the applicability threshold of 100 tons per year.

Georgia Rule 391-3-1-.02(2)(vv) – Volatile Organic Liquid Handling and Storage

Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(vv) [a.k.a Georgia Rule (vv)] requires that affected storage tanks be equipped with submerged fill pipes, which are defined as any fill pipe with a discharge opening that is within six inches of the tank bottom. Although the proposed Decostar facility will be equipped with four storage tanks with storage capacities in excess of 4,000 gallons, the facility will not be subject to Rule (vv) because it is not subject to any other VOC RACT standard contained in the Georgia Rules for Air Quality Control.

Georgia Rule 391-3-1-.02(2)(yy) –Emissions of Nitrogen Oxides from Major Sources

Applicability and Emission Standards: Georgia Rule 391-3-1-.02(2)(yy) [a.k.a Georgia Rule (yy)] requires a case-by-case RACT-level control technology review of major sources of NOx emissions. The proposed Decostar facility will not be subject to Georgia Rule (yy) because potential facility-wide NOx emissions will be less than the applicability threshold of 100 tons per year.

40 CFR 60 Subpart Kb -- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

Applicability and Emission Standards: New Source Performance Standard (NSPS) Subpart Kb contains requirements to reduce VOC emissions from bulk storage of volatile organic liquids. None of the storage vessels at the proposed Decostar facility will have capacities large enough to trigger applicability under

this NSPS; the NSPS does not apply to storage tanks with capacities less than forty (40) cubic meters.

40 CFR 60 Subpart MM -- Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations

Applicability and Emission Standards: New Source Performance Standard (NSPS) Subpart MM contains requirements to reduce VOC emissions from surface coating and solvent cleaning operations at automobile and light-duty truck assembly plants. This NSPS does not apply to the proposed Decostar plant because it does not meet the criteria for an automobile and light-duty truck assembly plant.

6. EMISSION RATES AND CHANGES

The methodologies used to quantify emissions from the emissions units at the Decostar facility are summarized in this section of the Notice of MACT Approval. The emission rates are calculated for all of the operations of the proposed facility. Projected emission rates are estimated by multiplying an emission factor by an associated process rate.

6.1 Case-by-Case MACT Applicability Under Section 112(g) of the 1990 CAAA

A newly constructed or reconstructed major source of HAP without a promulgated Part 61 or 63 NESHAP will be subject to the requirements 40 CFR 63.40 through 63.44, including a case-by-case MACT determination as described by the Section 112(g) of the 1990 Clean Air Act Amendments. The proposed Decostar facility is a "construct[ion] of a major source" as defined by 40 CFR 63.41. The facility will not be a reconstruction or modification of an existing site, and it will be a major source of HAP because it will have the potential to emit more than 10 tons per year of any individual HAP or 25 tons per year of any combination of HAPs.

6.2 HAP Emissions Profile

The surface coating operations at the proposed Decostar facility will be the primary source of HAP emissions. The other operations and utilities and support activities will also produce HAP emissions, but in much lower quantities. The table below provides a speciation of the HAP emissions from the facility, before (potential) and after (actual) controls.

HAP	Potential (tpy)	Actual (tpy)	Comment
Ethylene Glycol Monobutyl Ether	704	28.2	Abated by RTO
Xylene	421	16.8	Abated by RTO
MEK	90.5	4.27	Abated by RTO
Ethylbenzene	39.5	1.58	Abated by RTO
Methanol	34.3	2.02	Abated by RTO
Ethylene Glycol Monobutyl Ether Acetate	31.3	1.25	Abated by RTO
Toluene	20.3	0.81	Abated by RTO
MIBK	7.75	0.31	Abated by RTO
Glycol Ethers, Unspecified	5.00	0.20	Abated by RTO
Cumene	2.13	0.0852	Abated by RTO
Naphthalene	1.25	0.0500	Abated by RTO

Formaldehyde	0.882	0.0421	From surface coating and combustion.
Hexane	0.165	0.165	Combustion by-product; uncontrolled
MDI	0.113	0.113	uncontrolled
Total	**1360**	**56.8**	

The table below summarizes the HAP emissions from each major manufacturing process or support operation, before (potential) and after (actual) controls.

Process	Potential (tpy)	Actual (tpy)	Comment
Plastic Molding	1.30	1.30	Primarily mold cleaning solvents; some MDI
Surface Prep & Coating	1360	54.3	Abated by RTO; primarily glycol ethers and BTEX compounds
Hot Water Heater	0.172	0.172	Primarily hexane and formaldehyde from incomplete fossil fuel combustion
Tank Farm & Paint Kitchen	< 1.0	< 1.0	Insignificant evaporative losses of solvent; primarily glycol ethers and BTEX

7. MAXIMUM AVAILABLE CONTROL TECHNOLOGY (MACT) ANALYSIS

A 112(g) case-by-case MACT determination is required for this facility. MACT emission limitation for new sources is defined as:

> "…the emission limitation which is not less stringent that the emission limitation achieved in practice by the best controlled similar source, and which reflects the maximum degree of deduction in emissions that the permitting authority, taking into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, determines is achievable by the constructed or reconstructed major source." 40 CFR 63.41.

The requirements of the determination are set forth in 40 CFR 63.40 through 63.44.

7.1 MACT Technical Approach

Because EPA could not immediately issue MACT standards for all industries (and there was a potential for significant new sources of toxic air emissions to remain uncontrolled), section 112(g) of the Clean Air Act acts as a "gap-filler" requiring MACT-level control of air toxics when a new major source of HAP is constructed or reconstructed. The facility provides basic information about the source and its potential emissions through its air quality permit application. The application also specifies the emission controls that will ensure that new source MACT will be met. The Division reviews and approves (or disapproves) the application, and provides an opportunity for public comment on the determination.

The principles of a 112(g) case-by-case MACT determination are outlined in 40 CFR 63.43(d)(1) through (4) as follows:

> (d) *Principles of MACT determinations.* The following general principles shall govern preparation by the owner or operator of each permit application or other application requiring a case-by-case MACT determination concerning construction or reconstruction of a major source, and all subsequent review of and actions taken concerning such an application by the permitting authority:
>
> (1) The MACT emission limitation or MACT requirements recommended by the applicant and approved by the permitting authority shall not be less stringent than the emission control which is achieved in practice by the best controlled similar source, as determined by the permitting authority.

(2) Based upon available information, as defined in this subpart, the MACT emission limitation and control technology (including any requirements under paragraph (d)(3) of this section) recommended by the applicant and approved by the permitting authority shall achieve the maximum degree of reduction in emissions of HAP which can be achieved by utilizing those control technologies that can be identified from the available information, taking into consideration the costs of achieving such emission reduction and any non-air quality health and environmental impacts and energy requirements associated with the emission reduction.

(3) The applicant may recommend a specific design, equipment, work practice, or operational standard, or a combination thereof, and the permitting authority may approve such a standard if the permitting authority specifically determines that it is not feasible to prescribe or enforce an emission limitation under the criteria set forth in section 112(h)(2) of the Act.

*(*4) If the Administrator has either proposed a relevant emission standard pursuant to section 112(d) or section 112(h) of the Act or adopted a presumptive MACT determination for the source category which includes the constructed or reconstructed major source, then the MACT requirements applied to the constructed or reconstructed major source shall have considered those MACT emission limitations and requirements of the proposed standard or presumptive MACT determination.

7.2 Potential Control Options

The operations at the proposed Decostar facility were evaluated for potential applicability under NESHAPs that have already been promulgated. No currently promulgated NESHAP under 40 CFR Part 63 will be applicable to the proposed Decostar plant or the operations conducted in Decostar's manufacturing process.

The operations at the proposed Decosstar facility were next broken into subcategories for evaluation of appropriate MACT level controls under Section 112(g) of the 1990 Clean Air Act Amendments. This evaluation included a review of any proposed NESHAPs under Section 112(d) that have not yet been promulgated and an evaluation of the best-controlled similar sources in the industry located elsewhere in the United States and its territories. The review of best-controlled similar sources included an evaluation of the Textron Automotive facility in Americus, Georgia, which manufactures similar automobile components using similar surface coating operations and which has been subject to case-by-case BACT control technology reviews in the past.

The manufacturing process subcategories evauluated include: plastic molding operations, surface preparation and surface coating operations, the boiler/hot water generator in the Utilities & Support Section, the tank farm in the Utilities & Support Section, and the paint kitchen in the Utilities & Support Section.

The following federal MACT standards, or NESHAPs, have recently been proposed by U.S. EPA and will apply to the surface preparation and coating (inclusive of the paint kitchen) and the hot water generator manufacturing subcategories listed above:

- 40 CFR Part 63 Subpart PPPP, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products."

- 40 CFR Part 63 Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters."

U.S. EPA expects that a proposed MACT standard will be strongly considered in the Division's determination for case-by-case MACT level controls under Section 112(g) review. In the past, the Division has allowed facilities to adopt proposed MACT standards as case-by-case MACT level controls under Section 112(g) construction permit reviews.

There are no currently proposed or promulgated MACT standards that would apply to the plastic molding operations or the tank farm at the proposed Decostar facility.

Potential control strategies and technologies evaluated for each of the manufacturing subcategories included the following, in order of decreasing control efficiency:

- Thermal oxidation, which typically achieves destruction efficiencies in excess of 97 percent;

- Catalytic oxidation, which typically achieves destruction efficiencies between 95 and 98 percent;

- Adsorption, either by activated carbon or by zeolytes, which typically achieves control efficiencies between 92 and 98 percent;

- Condensation, which typically achieves control efficiencies between 65 and 86 percent; and

- Product substitution, which involves the re-formulation of materials to reduce their HAP content.

7.3 Technical Feasibility Review

A control method or technology is considered available if it can be obtained through commercial channels or applied within the common sense meaning of the term. An available control technology is applicable if it can reasonably be installed and operated. A technology that is both available and applicable is technically feasible. EPA has identified the potential control options in the proposed MACT standard as being available and applicable.

7.4 Company's Proposed MACT for HAP & VOC Control

Plastic Molding Operations:

HAP emissions from the plastic molding operations occur chiefly in the form of cleaning solvents and MDI pre-polymer that are emitted due to evaporative losses. Because of the "fugitive" nature and relatively low emissions of these substances, the resulting concentration of HAPs in the air streams leaving this production area will be very low. Although it might be technically feasible to abate these emissions by one of the control technologies listed above, the Division is unaware of any sources of this size that are involved in plastic molding operations and that abate the emissions from mold cleaning and repair or from un-reacted MDI pre-polymer. Furthermore, EPA has not listed this process as one of the source categories for MACT standard development; therefore, there are no promulgated or proposed MACT standards for this process, and no presumptive MACT standard has been established.

Regarding the pre-polymer emissions, the highest level of control achieved in practice by the best controlled similar sources appears to be the utilization of closed molding technology, which impedes evaporative loss of the pre-polymer reactants until the polymerization of the plastic is complete.

Regarding the solvent emissions from mold cleaning and repair, the highest level of pollution control achieved in practice by the best controlled similar sources appears to be the application of best management housekeeping techniques, such as storing new and spent solvent and solvent-laden materials in closed containers in order to minimize evaporative losses.

Decostar has proposed best-management techniques and work practice standards as MACT for HAP emissions from the plastic molding operations and associated mold cleaning and repair. These design and work practice standards include the use of closed molds to minimize evaporative losses of un-reacted pre-polymers prior to the completion of the polymerization reaction and the storage of all fresh and spent solvents, as well as solvent-laden materials, in closed containers in order to minimize evaporative losses of these materials.

Surface Preparation and Surface Coating Operations:

HAP emissions from the surface preparation and surface coating operations consist primarily of evaporative losses of solvents contained in the various cleaning compounds and coatings used in the process. Due to the nature of the substrate being coated, the ability of the applicant to utilize product substitution is severely limited; certain solvents listed as HAPs are essential ingredients in both the surface cleaning & preparation agents and the coatings in order to ensure that the coating adheres to the substrate and provides the physical characteristics required by the customer base. Therefore, the emphasis of the MACT evaluation was focused on abatement technologies such as thermal and catalytic oxidation and adsorption.

The surface coating of plastic parts and products is one of the listed source categories for which the U.S. EPA is required to develop a MACT standard, or NESHAP. Although EPA has yet to promulgate the MACT standard for this industry category, the agency has proposed a NESHAP, which constitutes presumptive MACT. This NESHAP, which will be promulgated as Subpart PPPP of 40 CFR Part 63, contains the following emission standards for new major sources in this category:

- 0.16 pounds HAP per pound of coating solids used for general use coatings;
- 0.26 pounds HAP per pound of coating solids used for headlamp coatings;
- 0.17 pounds HAP per pound of coating solids used for thermoplastic olefin (TPO) coatings; and
- 1.34 pounds HAP per pound of coating solids used for on-road vehicle coatings.

Affected sources may demonstrate compliance through one or more of the following options: use of compliant materials, weighted monthly averaging; and/or use of abatement devices. Sources that rely on abatement and/or averaging to demonstrate compliance with the above-mentioned standards must also employ work practice standards designed to minimize the evaporative loss of solvents to the atmosphere.

The emission standards for headlamp coatings and on-road vehicle coatings are not applicable to operations at the proposed Decostar facility, because this facility will not be engaged in the manufacture of headlamp components or fully assembled vehicles. In the BID documents and preamble to the proposed NESHAP, EPA defined TPO coatings as those which require the use of an adhesion promoter compound in addition to the traditional primer compounds.

Because Decostar will be utilizing an adhesion promoter on all of the components it will manufacture, they are proposing the emission standard of 0.17 pounds of HAP per pound of coating solids used as the sole emission standard for their coating systems. Based on the proposed MACT standard, all of the surface coating operations will be by definition TPO coating affected sources when the NESHAP is finalized.

The development of this MACT standard by EPA involved a detailed survey of the best-controlled sources involved in plastic coating operations throughout the United States and its territories. These sources included a number of facilities that, like the proposed Decostar facility, are involved in the production and coating of automobile components such as bumpers. These sources include, but are not limited to, Nissan Motor Manufacturing Corporation USA in Smyrna, Tennessee; Toyota Motor Manufacturing Corporation in Georgetown, Kentucky; New United Motor Manufacturing in Freemont, California; Honda of America Manufacturing, Incorporated in both East Liberty and Marysville, Ohio; Ford Motor Company Sandusky Plastics Plant in Sandusky, Ohio; Delphi Interior & Lighting Systems in Vandalia, Ohio; Delphi Delco Electronics Systems in Kokamo, Indiana; Delphi Automotive Systems in Adrian, Michigan; Neaton Auto Products in Eaton, Ohio; Cooper Automotive in Boyertown, Pennsylvania; UT Automotive in Berne, Indiana; United Technologies Automotive in Wauseon, Ohio, Iowa City, Iowa, Edinburgh, Indiana, and Dayton, Tennessee; Textron Automotive Company in Americus, Georgia, Athens, Tennessee, Columbia, Missouri, Evart, Michigan, Morristown, Indiana, Farmington, New Hampshire, Port Huron, Michigan, Rantoul, Illinois; Autoalliance International in Flatrock, Michigan; Collins & Aikman Plastics in Home, Manchester and St. Joseph, Michigan; and Guardian Automotive Trim in Evansville, Indiana. More detailed information regarding the survey of best-controlled sources and EPA's MACT development strategy and selection process is available in the background information document (BID) for this rule, which is available on the EPA's Air Toxic Website at http://www.epa.gov/ttn/atw.

The applicant has concluded that the provisions of the proposed NESHAP for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) constitute appropriate Maximum Achievable Control Technology pursuant to the requirements of Section 112(g) of the Clean Air Act and 40 CFR Part 63, Subparts A and B. Decostar proposes to comply with the provisions and emission standards of the proposed NESHAP by utilizing a combination of compliant materials and control technologies:

- The use of approximately 25 percent water-borne formulations in basecoat applications;

- The abatement of VOC and HAP emissions from surface coating operations via thermal oxidation with a minimum 96 percent destruction

efficiency and 100 percent capture efficiency through the use of permanent total enclosures; and

- The application of work practice standards, such as storing solvents and solvent-laden materials in closed containers, in order to minimize evaporative losses of VOC and HAP to the atmosphere.

Utilities:

The proposed Decostar facility will be equipped with one fire-tube boiler for the generation of hot process water. This boiler, or hot water generator, will eventually be subject to proposed Subpart DDDDD once it is promulgated. This unit is anticipated to emit, with the ultra-low NOx burner configuration that is required in order to comply with Georgia Rule (lll), less than one ton per year of VOC and less than one ton per year of PM, of which a portion will be HAPs. The types and amounts of HAP emitted are a function of the fuels that are burned and the size of the unit. In the case of the proposed Decostar hot water heater, the primary HAP emissions will be in the form of hexane and formaldehyde that result from incomplete combustion of natural gas.

The proposed NESHAP for this source category contains different emission limits according to their size, fuel consumed, and date of construction or reconstruction. The unit being proposed by Decostar would be classified as a new, large gas-fired unit under the proposed rule and would be subject to certain emission limits for particulate matter, hydrogen chloride and carbon monoxide (although carbon monoxide is not a HAP, it is being used as a surrogate for HAP emissions in the proposed NESHAP). However, the Decostar hot water heater, because it will burn only natural gas, will not be subject to any performance testing requirements. The only requirements of the proposed NESHAP that will apply to the Decostar hot water heater are the requirements for initial notification and certification of the types of fuel utilized in the unit. For this reason, Decostar is proposing a restriction on the type of fuel used in the hot water heater as MACT; they are proposing to utilize only natural gas as a fuel for the boiler. This restriction will also serve as compliance demonstration for other state and federal standards, including NSPS Subpart Dc and state rules (d) and (g).

Support Operations:

The remaining support operations at the proposed Decostar facility include the air handling units and comfort heaters and the tank farm. This type of equipment is not part of any listed source category for development of MACT standards, and therefore EPA has neither proposed or promulgated any NESHAPs for equipment or operations of this nature.

For the air handling units and comfort heaters, the applicant is proposing no additional controls as MACT beyond the restriction of natural gas as the fuel

source. The use of natural gas will significantly limit the nature and amounts of HAPs emitted by this equipment, and no similar sources could be identified that abate emissions of HAP from similar process equipment.

For the tank farm, the applicant is proposing no additional controls as MACT beyond the application of conservation vents to reduce evaporative losses of solvent to the atmosphere. No similar sources could be identified that utilize more stringent control techniques on storage vessels of the size and capacity proposed by the applicant.

7.5 Preliminary MACT Determination

Plastic Molding Operations:

The Division agrees with the conclusions of the applicant regarding the level of control achieved in practice by the best controlled similar sources and approves the MACT determination proposed by the applicant. MACT for the plastic molding operations and associated mold cleaning and repair will consist of design and work practice standards to minimize evaporative losses of HAP-containing solvents and reactants to the atmosphere.

Surface Preparation and Surface Coating Operations:

The Division agrees with the conclusions of the applicant regarding the use of EPA's proposed NESHAP as presumptive MACT for the surface coating operations. Furthermore, the Division agrees with the applicant's assessment of the TPO coating emission standard as the applicable emission standard for the proposed surface coating operations. The capture system and control technology proposed by the applicant are equivalent to those used in practice by the best-controlled similar sources found in EPA's MACT development survey and the RACT/BACT/LAER clearinghouse. Furthermore, they represent the state of the art control technology for abatement of emissions from plastic parts surface coating operations; none of the other control strategies evaluated would result in a greater overall control efficiency than that proposed by the applicant. Therefore, the applicant's proposed MACT determination is approved by the Division.

Compliance with the emission standards will be demonstrated through initial performance tests of the capture system and thermal oxidizer used to abate HAP emissions from the coating line and through monitoring of appropriate capture system and oxidizer operational parameters, including the pressure drop across the oxidizer and the temperature within the combustion zone of the oxidizer. Records of material usage, as well as the VOC, HAP and solids content of these materials, must be maintained. Compliance with the work practice standards will be demonstrated through periodic inspections of the coating line to ensure that all applicable work practice standards are being properly implemented. These performance testing, monitoring and record-keeping provisions are consistent

with those contained in Title V operating permits issued to similar sources located in Georgia.

Utilities:

The Division has reviewed the proposed operational restrictions that the applicant has proposed as MACT for the hot water heater, as well as the extensive research prepared by U.S. EPA in the course of development of the proposed Subpart DDDDD NESHAP. This research, which is available in the background information docket and summarized in the preamble to the proposed rule, provides extensive documentation and rationale for not requiring emissions controls or associated performance testing and monitoring on units that burn only liquid or gaseous fossil fuels, excluding residual oil. Furthermore, this documentation includes a survey of the best-controlled similar sources in the country. The Division approves Decostar's proposal of an limiting fuel sources for the hot water heater to natural gas. Compliance with this MACT standard will be demonstrated through monitoring and record-keeping of fuel consumption by the hot water heater.

Support Operations:

The Division approves the applicant's MACT determination for the air handling units and comfort heaters. These units will be limited to natural gas as the fuel source.

8. AIR QUALITY ANALYSIS

8.1 Toxic Impact Assessment (TIA) Modeling Results

Following the procedures as specified in the "Guidelines for Ambient Impact Assessment of Toxic Air Pollutant Emissions", modeling done by both the Division and the company indicate that the maximum ground level concentrations for all toxic air pollutants that will be emitted from this operation are well below the acceptable ambient concentrations. As the result, the toxic emissions impact from the construction and operation of the proposed facility is expected to be insignificant.

ATTACHMENTS

A.1 Draft Air Quality Permit No. 3714-045-0059-E-01-0

A.2 40 CFR 63 Subpart PPPP, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products" (proposed)

A.3 40 CFR 63 Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers and Process Heaters" (proposed)

A.4 Toxic Impact Assessment (TIA) Information & Results