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Subject:: Docket ID No. EPA-R05-OAR-2006-0716

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John Mooney
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Air Programs Branch
U.S. Environmental Protection Agency

Submitted electronically: mooney.john@epa.gov

Re: Docket ID No. EPA-R05-OAR-2006-0716

The American Composites Manufacturers Association is pleased to comment on EPA's proposed adoption of an amended Indiana State Implementation Plan, as published in the Federal Register on January 25, 2007. (72 FR 3377)

Indiana's amended SIP would exempt from requirements of the VOC rules contained in the SIP those facilities subject to the boat manufacturing and reinforced plastic composites production NESHAP. As EPA correctly notes in the January 25 Notice, the major VOC emitted from these facilities are subject under the NESHAP to enforceable emission reductions. An additional requirement to comply with the SIP VOC rules would place a redundant and unnecessary administrative burden on both the facilities and the state.

A study conducted for ACMA in 2003 evaluated whether composite manufacturing operations at which all VOC sources comply with the NESHAP would also satisfy VOC requirements, and concluded that a facility that meets the NESHAP requirements should also automatically comply with VOC SIP requirements, including LAER, BACT and RACT. A copy of this study is attached.

ACMA strongly supports EPA's approval of the proposed amendment to the Indiana SIP.

Sincerely,



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Attachment: "Pollution Prevention In Reinforced Composites NESHAP v. VOC Control Technology Requirements: Evaluation Of Technical Equivalence," December, 2003.



NESHAP equiv to VOC rules.pdf