



NORTH CAROLINA
Environmental Quality

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October 31, 2018

EPA Docket Center
U.S. Environmental Protection Agency (EPA)
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket Nos. EPA-HQ-OAR-2017-0668; EPA-HQ-OAR-2017-0669; EPA-HQ-OAR-2017-0670

Subject: Comments on Proposed Rulemaking – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances; Printing, Coating, and Dyeing of Fabrics and Other Textiles; and Surface Coating of Metal Furniture Residual Risk and Technology Reviews.

Dear Sir/Madam:

On behalf of the North Carolina Department of Environmental Quality, Division of Air Quality (NC DAQ), thank you for the opportunity to comment on the proposed rules “National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Large Appliances; Printing, Coating, and Dyeing of Fabrics and Other Textiles; and Surface Coating of Metal Furniture Residual Risk and Technology Reviews” published in the *Federal Register* (83 FR 46262) on September 12, 2018.

Section 112(d)(6) of the Clean Air Act requires EPA to review and revise the maximum achievable control technology (MACT) standards, as necessary, considering developments in practices, processes and control technologies so that the risks due to emissions of air toxics from the sources under the current standards are acceptable and that the standards provide an ample margin of safety to protect public health. The EPA recently proposed rulemaking for three NESHAPs, finding the risks acceptable, and that no revisions to the numerical emissions limits were necessary.

NC DAQ has reviewed the proposed rulemaking and makes the following observations. The state of North Carolina does not have any facilities that are subject to the NESHAP for Surface Coating of Large Appliances (Subpart NNNN) or the NESHAP for Surface Coating of Metal Furniture (Subpart RRRR). Therefore, no comments are necessary for these two rules. The remainder of this letter is related to the NESHAP for the Printing, Coating, and Dyeing of Fabrics and Other Textiles (Subpart OOOO).



The EPA finalized the NESHAP for Subpart OOOO on May 29, 2003. As part of the rule, EPA set emission limits for organic HAP emissions from three operations subcategories: printing and coating; dyeing and finishing; and slashing. The proposed changes to this rule include provisions to require electronic submittal of all compliance reports (including performance test reports), revisions to the startup, shut down and malfunction (SSM) provisions, addition of Method 18 as an alternative test method, and various technical and editorial changes.

EPA is not proposing any changes to the reporting frequency now, although they are requesting comments on changing the reporting frequency from semiannual to annual reporting in the rules. Since Title V permits are required to include semiannual reporting, NC DAQ notes that there would be no lessening of burden for facilities with a change of the reporting frequency to an annual basis.

EPA is seeking comments on a requirement to retest add-on control equipment anytime there is a process change that may adversely affect compliance with an emission limit. A process change could include venting additional equipment to the control device, increase in line speeds, increase in coating materials used, new coating materials, etc. The EPA suggests that a reasonable time limit under the new operations would be approximately 30 days to allow adequate time for testing and preparing a test report with an estimated cost for a test of \$19,000. The requirement of a retest is in-line with other NESHAP rules. However, NC DAQ encourages EPA to reconsider this time requirement. The 30-day time frame to perform a test after a process change affecting compliance with an emission limit change does not seem adequate to allow a facility time to schedule an outside contractor to perform the required testing. In addition, test report preparation, review by responsible official, and submission of results is likely to require more than 30 days. NC DAQ suggests a 60-day or 90-day time frame as more appropriate.

Thank you again for the opportunity to comment on this proposed rule. I trust that the comments will be considered as EPA prepares the final rule. If you have any questions regarding our comments, please contact Robin Barrows of my staff at (919) 707-8445 or robin.barrows@ncdenr.gov.

Sincerely,



Michael Abraczinskas,
Director, Division of Air Quality
NC Dept. of Environmental Quality

cc: Steve Hall; Gary Saunders; Robin Barrows; Denise Hayes; Taylor Hartsfield (via email only)
File - MACT Taskforce