Control Techniques Guidelines and Standards for Fiberglass Boat Manufacturing Operations COMAR 26.11.19.26-1

Air Quality Control Advisory Council
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Topics Covered

• Background

• Basis of Control Techniques Guidelines (CTG) for Fiberglass Boat Manufacturing

• CTG Applicability

• Standards

• Air Quality and Economic Impact
Background

• Control Techniques Guidelines (CTG)
  – Miscellaneous metal and plastic parts coating

• CTG standards for Fiberglass Boat Manufacturing requires new COMAR regulation

• CTG standard and COMAR amendment had been developed in coordination with Permits and Compliance Programs affected sources and EPA
Basis of CTG for Fiberglass Boat Manufacturing

• In 1990, EPA completed a study of fiberglass boat manufacturing operations

• The National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, 40 CFR part 63, subpart VVVVV (2001 NESHAP) were promulgated in 2001

• The CTG was developed based on the 1990 VOC assessment, the 2001 NESHAP, and existing California district and other State VOC emission reduction approaches
This regulation applies to any fiberglass boat manufacturing facility where the total actual VOC emissions, before add-on controls, from all fiberglass boat manufacturing is 15 pounds or more per day as determined on a monthly average.
Fiberglass boat manufacturing facility means a facility that manufactures hulls or decks of fiberglass boats, assembles fiberglass boats from premanufactured hulls and decks, or builds molds to make hulls or decks of fiberglass boats.

VOC emissions from the manufacturing process, polyester resins, tooling resins and gel coats, ancillary parts production, touch-up, clean-up, and repair are to be included in determining applicability.

The manufacturing of one boat would be sufficient to trigger applicability.
COMAR 26.11.19.26-1 Fiberglass Boat Manufacturing

- COMAR 26.11.19.26-1 sets VOC standards to reduce the emissions from materials used in the fiberglass boat manufacturing operation

- The process emissions come from styrene and methyl methacrylate (MMA) at fiberglass boat manufacturing facilities

- The resins and gel coats are the main contributors of VOC emissions from fiberglass boat manufacturing facilities
COMAR 26.11.19.26-1 Fiberglass Boat Manufacturing Standards

• Standards
  – Production resin operation
  – Pigmented and Clear gel coat
  – Tooling resin and gel coat

• Alternative option of emission rates for monomers and non monomers

• Certain specific exemptions

• The work practice requirements establish standards and record keeping requirements for the usage of all VOC containing materials.
Air Quality and Economic Impact

• VOC emissions on a national level are expected to be reduced by 40 percent
  – MD only has one known source that may, on occasion, assemble fiberglass boats from premanufactured hulls and decks
  – May already be using resins and gel coats that meet the VOC standards contained in CTG
  – MD VOC emission benefits will be negligible

• The economic impact of these amendments has been estimated by EPA on a national level. Costs for the controls are expected to be $4,200/ton of VOC controlled
  – Coatings industry already has products available to meet VOC standards
  – Economic impact upon MD sources should be minimal