



FACT SHEET

In re: Proposed revisions to Air Pollution Control Regulation No. 51 “Control of VOC Emissions from Fiberglass Boat Manufacturing”

Introduction

The Department of Environmental Management (DEM), Office of Air Resources, is proposing to add a new air pollution control regulation, 250-RICR-120-05-51 “Control of VOC Emissions from Fiberglass Boat Manufacturing” (Part 51). Part 51 limits emissions of volatile organic compounds from fiberglass boat manufacturing operations.

Description of Proposed Amendments

The Department is proposing to add a new air pollution control regulation, Part 51, to meet the requirements contained in the EPA Control Technique Guideline Document, “*Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials.*”

The proposed regulation will apply to any facility that manufactures fiberglass boat hulls or decks or related parts, builds molds to make fiberglass boat hulls or decks or related parts, or makes polyester resin putties for assembling fiberglass boats, whose total actual VOC emissions, before controls, are greater than or equal to fifteen (15) pounds per day. The rule will not apply to facilities that solely manufacture parts of boats, such as hatches, seats, or lockers, or boat trailers, and do not manufacture hulls or decks of boats from fiberglass or build molds to make fiberglass boat hulls or decks. Affected sources will be subject to emission limitations, work practice standards, and recordkeeping and reporting requirements.

Demonstration of Need

On March 6, 2017 EPA issued a finding of failure to submit to Rhode Island for failure to submit required State Implementation Plan (SIP) components to address Clean Air Act requirements for the 2008 Ozone National Ambient Air Quality Standard. The finding establishes deadlines by which states either must submit complete SIP revisions or become subject to sanctions. The offset sanction is currently in place.

Specifically, 40 CFR § 51.1116 required RI to submit a SIP revision that meets the requirements of Section 184(b) of the Clean Air Act. Section 184(b) requires states in the ozone transport region to implement or update reasonably available control technology (RACT) controls on all major VOC and NO_x emission sources and on source categories covered by a Control Technique Guideline (CTG) document. In 2008 EPA published a CTG recommending VOC controls for fiberglass boat manufacturing operations. The Department is proposing to incorporate this CTG

into Part 51, “Control of VOC Emissions from Fiberglass Boat Manufacturing,” which will be submitted to the U.S. Environmental Protection Agency for approval in Rhode Island's State Implementation Plan. RI must make a complete SIP submission by March 6, 2019 or further sanctions may be imposed.

Alternative Approaches Considered

No alternative approaches were considered.

Identification of Overlapped or Duplicated State Regulations

The Office of Air Resources has identified no state regulations that overlap or duplicate the proposed regulation.

Determination of Significant Adverse Economic Impact on Small Business or Any City or Town

The Office of Air Resources has determined that Part 51 would not have a significant adverse economic impact on small businesses or cities and towns in the State. A full cost benefit analysis was completed and showed little or no impact on small business. The cost benefit analysis can be found at the website listed below.

For more information of copies of documents related to this proposal contact:

Karen Slattery, Supervising Air Quality Specialist
Office of Air Resources
235 Promenade Street
Providence, RI 02908
Phone: (401) 222-2808 ext. 7030
E-Mail: karen.slattery@dem.ri.gov
Or, visit the Proposed Regulations section of the DEM website at:
<http://www.dem.ri.gov/documents/regulations/>