

Stakeholder Comments on the Draft MMPP Data Collection Questionnaire

A draft of the Data Collection Questionnaire was made available for comment by EPA earlier this year. This document summarizes many of those comments and EPA's responses to them.

Comment: This survey is very long and will be time consuming to complete. Can it be shortened?

Response: EPA has removed several forms from the original draft and many items from individual forms. In general, the survey forms now contain only the information EPA feels is necessary to proceed with its rule development process.

Comment: Facilities should not be required to report the same information on various forms.

Response: EPA has condensed and/or clarified questions that appeared to ask for the same information in different areas.

Comment: How specific does the facility need to be when "defining a product"?

Response: A facility should list the groups of products that it coats. Products can be grouped by Standard Industrial Classification (SIC), North American Industrial Classification System (NAICS), or by any other method you deem appropriate.

Comment: What if 1997 was not a representative year for a facility?

Response: If 1997 was unusual for some reason, provide information from a representative year and provide an explanation as to why 1997 was not representative. In any case, indicate on Form A the year for which data is being reported.

Comment: Research and Development (R&D) activities are currently being covered by a specific MACT development team. Why are R&D questions being asked?

Response: The R&D MACT development team asked other teams to assist them in locating R&D facilities by adding a few questions to their questionnaires. There were originally five questions that were to be asked, however, EPA has pared R&D questions on the MMPP questionnaire down to one.

Comment: Please clarify why a plant layout schematic is necessary.

Response: In order to make the questionnaire responses less burdensome to industry, the request for plant layout schematics has been removed from the questionnaire.

Comment: A 5% tolerance point for HAPs is not enough to group similar coatings.

Response: EPA changed the tolerance point for grouping materials with similar formulations to 10% of Total HAP and 10% of Total VOC.

Comment: Do you really need material usage on a material-by-material basis?

Response: Yes, this data may come into play if there is a de minimis level for touch up or specialty coatings. However, like materials may be grouped if they have similar

Stakeholder Comments on the Draft MMPP Data Collection Questionnaire

HAP and VOC content (see previous comment), are of the same type (coating, thinner, etc.), and are of the same resin-type or coating technology for coatings.

Comment: Information about “resin types” is irrelevant and will not contribute to the MACT floor determination.

Response: If the MMPP Surface Coating source category were not so diverse and an approach such as is possible with a narrowly defined source category was possible, resin type would be less consequential. Resin type is one factor that determines which coating technology is feasible. Control options may be limited due to which coating technologies are possible with a specific resin type. The conditions under which a part or product will operate may be a consideration for which resin type may be most appropriate. Each industry sector has its own set of requirements for the type of surface coating (including resin type) that is acceptable for its products.

Comment: Facilities should be allowed to supply a copy of the Material Safety Data Sheets (MSDS) or Certified Product Data Sheets (CPDS) as an alternative to recreating the formulation information in the format of the questionnaire.

Response: There is no standard format for MSDS or CPDS forms and the level of detail is not consistent between providers of these information sheets. EPA has requested specific information that may be available from these sources, and if so, should be used to fill out Form B. Form B allows EPA to perform analyses on all collected data on an equal basis (i.e., comparing apples to apples).

Comment: Why do you need speciated components?

Response: EPA is asking for speciated components for a number of reasons, including but not limited to: possible delisting of compounds as a VOC or as a HAP, reactivity-based regulations for VOC, and residual risk-based analysis for HAPs.

Comment: The instructions for the Add-on Control Devices form (Form C) state that the manufacturers’ specifications and schematics should be submitted; this information is irrelevant to the MACT floor determination.

Response: In order to make the questionnaire responses less burdensome to industry the request for control device specifications and schematics has been removed from the questionnaire. Form C, however, does need to be completed for each add-on control device.

Comment: Information about coating thicknesses applied to parts is irrelevant to the MACT floor determination.

Response: Although this parameter has been used with some industry segments, EPA agrees that this information may not be necessary for MMPP facilities. Therefore, the question regarding coating thickness applied has been removed from the questionnaire.

Stakeholder Comments on the Draft MMPP Data Collection Questionnaire

- Comment: Information about the surface area coated is irrelevant to the MACT floor determination.
Response: The question regarding surface area coated has been removed from the questionnaire.
- Comment: Information about the substrate type coated is irrelevant to the MACT floor determination.
Response: EPA wants to avoid choosing the low-emitting options in each type of application that are not compatible with one another, or to have a low-emitting set of options specified that is incompatible with a product. Substrate type is a key piece of information for those determinations.
- Comment: Maximum Design Capacity is irrelevant to the MACT floor determination.
Response: Questions asking for the maximum design capacity of a piece of equipment have been removed from the questionnaire.
- Comment: EPA should clarify why information on “Storage” is being requested.
Response: Upon further review, EPA determined that information obtained regarding storage of materials would most likely not be significant in the MACT floor determination and the form requesting this information was removed from the questionnaire.
- Comment: EPA should clarify why information on “Mixing Operations” is being requested.
Response: Upon further review, EPA determined that information obtained regarding mixing operations is not likely to be significant in the MACT floor determination and the form requesting this information was removed from the questionnaire.
- Comment: EPA should clarify why information on “Cleaning Operations” is being requested.
Response: Upon further review, EPA determined that information obtained regarding cleaning operations would probably not be significant in the MACT floor determination and the form requesting this information was removed from the questionnaire. However, cleaning solvent usage should be reported on Form B.
- Comment: No information on pollution prevention measures is requested in the questionnaire.
Response: A question was added to the General Facility Information form (Form A) asking for pollution prevention measures taken at the facility level. Questions on Forms D and E relate to pollution prevention, but do not use the name specifically.
- Comment: The availability of an electronic template for the Questionnaire would be greatly appreciated as this would make preparation of the responses less time consuming.
Response: EPA is working on developing an electronic version of the questionnaire which would be available through the EPA’s United Air Toxics web page for this project.

Stakeholder Comments on the Draft MMPP Data Collection Questionnaire

Comment: Emissions due to inorganic HAP compounds in pigments are insignificant and should not be included in emissions calculations.

Responses: Any material that has the potential to volatilize or otherwise be emitted during use should be included in the emissions. If the inorganic HAP is not emitted, it is inconsequential.