

compliance status of process vents; and requests for extensions of the allowable repair period and notifications of

inspections for storage vessels and wastewater.

TABLE 6.—SUMMARY OF EXCURSIONS

Emission source type	Type of excursion	Description of excursion
Continuous Front-End Process Vents.	Daily average exceedance. Insufficient monitoring data.	When the daily average of a monitored parameter is above the maximum, or below the minimum, established level. Insufficient monitoring data is when an owner or operator fails to obtain a valid hour of data for at least 75 percent of the operating hours during an operating day. Four 15-minute parameter measurements must be obtained to constitute a valid hour of data.
Batch Front-End Process Vents.	Batch cycle daily average exceedance. Insufficient monitoring data.	When the daily average of a monitored parameter is above the maximum, or below the minimum, established level. Insufficient monitoring data is when an owner or operator fails to obtain valid parameter measurements for at least 75 percent of the 15-minute periods during all controlled batch cycles during an operating day.
Back-End Process Operations complying by stripping/sampling.	Weekly weighted average.  Insufficient sampling data.	When the weekly weighted average HAP content of polymers processed is above the level in the standard.  Insufficient sampling data is when an owner or operator fails to sample and/or analyze the residual HAP content for at least 75 percent of the times during the week when sampling is required.
Back-End Process Operations complying by stripping/stripper parameter monitoring.	Weekly weighted average.  Failure to sample .....  Insufficient stripper monitoring data.	When the weekly weighted average HAP content of polymers processed is above the level in the standard.  When a sample is not taken and analyzed in situations where a one hourly average stripper parameter value is not in accordance with the established parameter level. Insufficient stripper monitoring data is when an owner or operator fails to obtain valid stripper monitoring data for at least 75 percent of grades or batches processing during the week. Stripper operating parameter measurements must be obtained for at least 75 percent of the 15-minute periods during the processing of a grade or batch to constitute valid stripper monitoring data.

In addition, quarterly reporting of the number of batch cycles accomplished for Group 2 batch process vents is required. Every fourth quarterly report would be required to include the total batch cycles accomplished during the previous 12 months, and a statement whether the owner or operator is in compliance with the batch cycle limitation.

## V. Discussion of Major Issues

The Administrator welcomes comments from interested persons on any aspect of the proposed standards, and on any statement in the preamble or the referenced supporting documents. The proposed standards were developed on the basis of information available. The Administrator is specifically requesting factual information that may support either the approach taken in the proposed standards or an alternate approach. To receive proper consideration, documentation or data should be provided. Specifically, the EPA is requesting comment and data on the following issues.

As mentioned in section IV.A, the manufacture of some polymeric resins and copolymers is similar in some ways to the manufacture of the elastomers covered by today's proposed rule. The EPA does not intend for today's

proposed regulation to cover the production of resins and copolymers, but recognizes that the relatively broad elastomer type definitions in today's proposed regulation could be interpreted to include some styrene butadiene resins and copolymers. The EPA considered distinctions based on several factors, including glass transition temperature, extent of conversion of monomers, process difference, vulcanizability, SIC Codes, and relative ratio of styrene and butadiene monomers, but discovered that each of these has limitations in its ability to accurately and clearly distinguish between elastomers and resins/copolymers. Therefore, the EPA is asking for comment on specific methods or criteria to distinguish between elastomers and resins/copolymers.

The proposed rule allows the monitoring of stripper parameters instead of the daily crumb/latex sampling and analysis. The EPA is request comments on the use of predictive computer modeling to monitor process parameters and predict emissions, instead of parameter monitoring or daily sampling and testing.

The back-end operations provisions in today's proposed regulation requires

that samples of crumb rubber or latex be taken at the exit of the stripper, before any opportunity for emission of HAP to the atmosphere. The EPA is requesting comments on the technical feasibility and potential safety problems associated with these sampling requirements.

The EPA is also requesting comments on the format of the back-end provisions limiting the concentration of carbon disulfide in dryer vents at styrene butadiene rubber by emulsion production facilities. Industry representatives have made the EPA aware of other approaches that could be taken to reduce these carbon disulfide emissions, such as a limit on the amount of sulfur-containing shortstopping that could be used. The EPA is interested in comments on the appropriateness of the format for this section of the proposed rule, as well suggestions for alternative approaches.

In today's proposed rule, emissions averaging is only allowed among emission points associated with a single elastomer subcategory. There are instances where more than one subcategory is present at the same plant site. The EPA is interested in specific instances where emissions averaging between subcategories is beneficial and, more broadly, on the merits of allowing emissions averaging across