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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

AUG 31 1988

Michael A. Stawarz, P.E.
New York Department of
Environmental Conservation
Region 5 - Environmental Quality
Hudson Street
Warrensburg, New York 12885

Dear Mr. Stawarz:

This is in response to your August 16, 1988 letter to Gary McCutchen requesting some clarification of the term "glass fiber processing plant." You specifically asked if this term was "intended to include facilities that use glass fibers (such as a manufacturer of fiberglass storage tanks)." In a subsequent telephone conversation with Mr. John Conover of your staff, Mr. McCutchen said he would investigate the matter and respond in writing.

Facilities that use glass fibers to manufacture other products, such as fiberglass-reinforced composites, were not intended to be included in the "glass fiber processing" category. After investigating the origin of the source category listing and subsequent rulemakings by the Environmental Protection Agency, we have concluded "glass fiber processing" was intended to include only those facilities engaged in making glass fiber. While the plants that produce glass fiber and filament sometimes integrate the manufacture of insulating wools and 100 percent glass fiber fabrics, the manufacture of fiberglass-reinforced composites is a substantially different process, which is more similar to a surface coating process. The typical pollutant from the production of glass fiber would be particulate; whereas, the pollutant from manufacturing fiberglass-reinforced storage tanks, for example, would be primarily volatile organic compounds.

Please call me at (919) 541-0871 if you have further questions regarding the definition of "glass fiber processing."

Sincerely,

Dennis W. Crumpler
New Source Review Section
Noncriteria Pollutant Programs Branch

cc: G. McCutchen