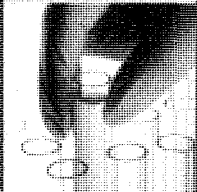
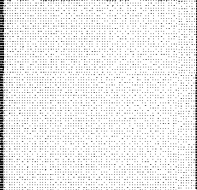
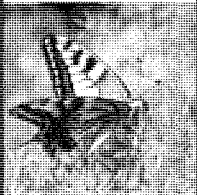
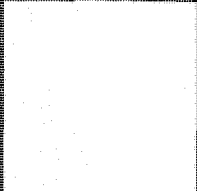
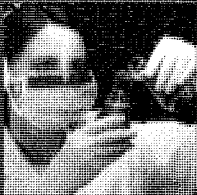


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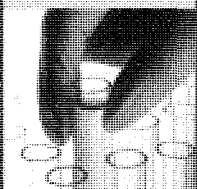
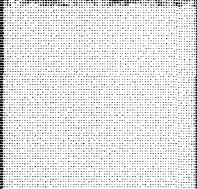
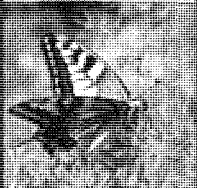
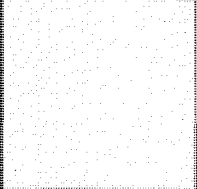
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Family of Materials

- **CMAS Rule Definition of “Family of Materials”:**
 - There is no definition in the CMAS rule.
- **MON Rule Definition of Family of Materials:**
 - Family of materials means grouping of materials with the same basic composition produced using the same basic feedstocks, but that may vary, for example, by molecular weight, functional group, or manufacturing configuration. Examples of families of materials include, but are not limited to alkyd resins, polyester resins, and synthetic fatty acids.

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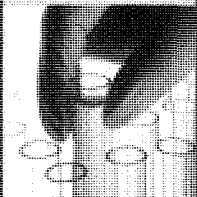
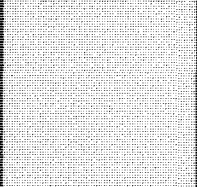
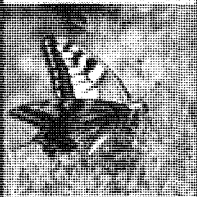
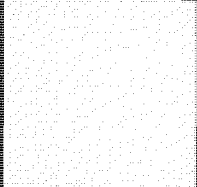
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Family of Materials

- **EPA MON Rule FOM Interpretation in Powerpoint Presentation Submitted to SOCMA on 12/15/09:**
 - **Family of materials means a grouping of materials with the same basic composition or the same basic end use or functionality produced AND uses the same basic feedstocks with essentially identical HAP emission profiles (primary constituent and relative magnitude on a pound per product basis) and manufacturing configuration.**

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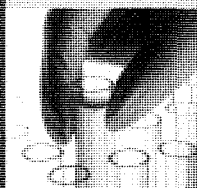
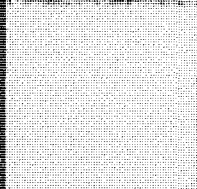
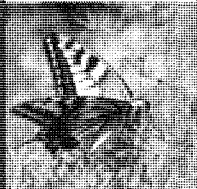
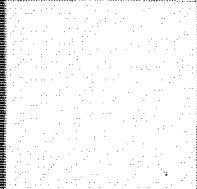
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Family of Materials

- **Based on a 2/25/10 meeting with Randy McDonald, EPA put Family of Materials in CMAS Rule to prevent industry from dividing up processes.**
- **Note that the family of material concept would not prevent the break- up of the API 5 step processes because each step has entirely different chemistry.**

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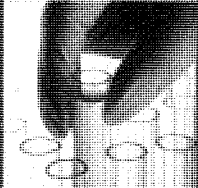
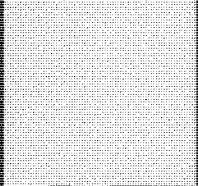
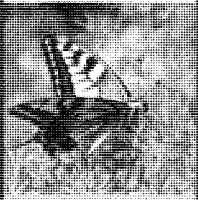
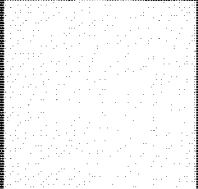
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Family of Materials

- **Reasons Why SOCMA is Confused by the above definitions:**
 - **Since the terms “same basic composition, same basic end use, and same basic feedstocks with essentially identical HAP emission profiles (primary constituent and relative magnitude on a pound per product basis) and manufacturing configuration” are not defined, they could be subject to inconsistent interpretations by State regulators.**
 - **Are the feedstocks used to make the products in the power point slides I will later present essentially identical? What criteria should be applied to make this decision?**

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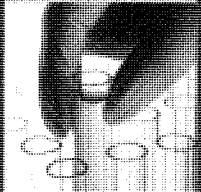
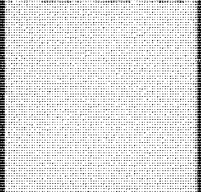
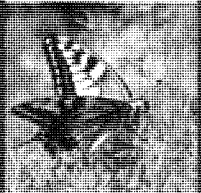
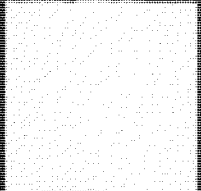
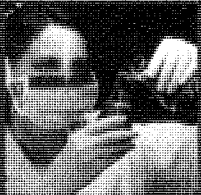
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Family of Materials

- What does “essentially identical HAP emission profiles (primary constituent and relative magnitude on a pound per product basis”) mean? Only one of the 2 processes shown in one slide and only one of the 2 processes shown in another slide generates an urban HAP. Does that mean the other processes are not in the same family of materials?**

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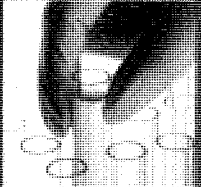
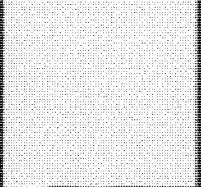
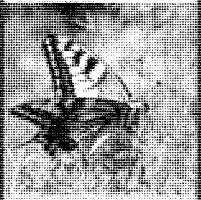
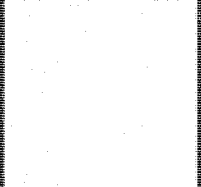
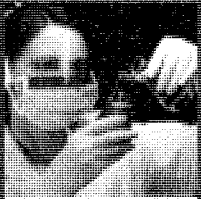
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Family of Materials

- To be in a family of materials, would a process have to meet all 3 of the following conditions?
 - Have the same basic composition or the same basic end use or functionality produced; and
 - Use the same basic feedstocks with essentially identical HAP emission profiles (primary constituent and relative magnitude on a pound per product basis); and
 - Use the same basic manufacturing configuration.

- What does “the same basic manufacturing configuration” mean? If an extra dryer is used, is the configuration still the same?

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Possible Solutions to FOM Issue

Either define the
aforementioned terms in the
CMAS rule or delete Family
of Materials from the CMAS
rule.