

1/9/80

MEMORANDUM

SUBJECT: PSD Applicability

FROM: Director
Division of Stationary Source Enforcement

TO: Stuart Roth
General Enforcement Branch - Region II

In response to Stephen Dvorkin's memo of October 31, 1979, I would consider a plant which produces fiberglass reinforced shower enclosures and bathtubs to be a "glass fiber processing plant". "Glass fiber processing" is one of the 28 industries listed under §169(1) of the Act. While I cannot be certain as to what Congress meant to include within this category, I think it makes sense that a plant whose process involves combining fiberglass and polyester resin should be included. If Congress had not intended certain fabricating operations to be included, it probably would have named the category "glass fiber manufacturing".

I do not think that a plant which processes already-fabricated fiberglass products should fall within this category. For instance, a company which buys fiberglass fabric and makes curtains from it would not be included. The company which manufactures the fabric from raw fiberglass would be included.

This response has been coordinated with the Office of Air Quality Planning and Standards. Please direct any questions on this memo to Libby Scopino of my staff at 755-2564"

Edward E. Reich

cc: Stephen Dvorkin, R. II
Richard Rhoads, OAQPS
Michael James, OGC