

TABLE 1.—PROCESS UNITS THAT ARE SUBJECT TO THE PROPOSED CONTROL REQUIREMENTS

For the following process units . . .	Does today's proposed rule include control requirements for . . .	
	Existing affected sources?	New affected sources?
Softwood veneer dryers; tube dryers; strand dryers; green rotary dryers; hardboard ovens; reconstituted wood product presses; and pressurized refiners.	Yes .....	Yes.
Press predryers; fiberboard mat dryers; and board coolers .....	No .....	Yes.
Dry rotary dryers; veneer redryers; plywood presses; engineered wood products presses; hardwood veneer dryers; humidifiers; atmospheric refiners; formers; blenders; rotary agricultural fiber dryers; agricultural fiber board presses; sanders; saws; fiber washers; chippers; log vats; lumber kilns; storage tanks; wastewater operations; miscellaneous coating operations; and stand-alone digesters.	No .....	No.

The affected source for this proposed rule is the combination of all PCWP manufacturing operations, including PCWP process units, onsite storage of raw materials, onsite wastewater treatment operations associated with PCWP manufacturing, and miscellaneous coating operations located in a single facility covering a contiguous area under common control that is also a major source. One of the implications of the proposed definition of affected source is that the control requirements or "floor," as defined in section 112(d)(3), are determined for the entire PCWP facility. Therefore, except for lumber kilns not otherwise located at PCWP facilities, this proposed rule contains the control requirements that represent the MACT level of control for the entire facility. For lumber kilns not otherwise located at PCWP facilities, this proposed rule contains the control requirements that represent the MACT level of control only for lumber kilns.

#### *B. What Pollutants Are Regulated by This Proposed Rule?*

The proposed rule would regulate HAP emissions from PCWP facilities. For the purpose of compliance with 40 CFR part 63, subpart DDDD, we defined "total HAP" to be the sum of the emissions of six primary HAP emitted from PCWP manufacturing. For the purpose of determining whether your facility is a major source, you would have to include all HAP as prescribed by rules and guidance pertaining to determination of major source.

The six HAP that define "total HAP" are: Acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. Other HAP are sometimes emitted and controlled along with these six HAP, but in low quantities that may be difficult to measure. Depending upon which of the compliance alternatives you choose, you could be required to measure emissions of total hydrocarbon (THC), methanol,

or formaldehyde as surrogates for measuring total HAP.

#### *C. What Are the Compliance Options?*

Today's proposed rule includes a range of compliance options which are summarized in the following subsections. You would have to use one of the compliance options to show compliance with the proposed rule. In most cases, the proposed compliance options would be the same for new and existing sources. Dilution to achieve compliance is prohibited as specified in 40 CFR 63.4.

##### *1. Production-Based Compliance Options*

Today's proposed rule includes production-based compliance options which are based on total HAP and vary according to type of process unit. Total HAP emissions are defined in today's proposed rule as the total mass emissions of the following six HAP: Acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The production-based compliance options are in units of mass of pollutant per unit of production. Add-on control systems may not be used to meet the production-based compliance options. For pressurized refiners and most dryers, the production-based compliance options are expressed as pounds per oven-dried ton of wood (lb/ODT). For presses, hardboard ovens, and some dryers, the production-based compliance options are expressed as pounds per thousand square feet of board (lb/MSF), with a reference board thickness.

##### *2. Add-On Control System Compliance Options*

If you operate a process unit equipped with an add-on control system, you may use any one of the following six compliance options. "Add-on control system" or "control system" means the combination of capture and control

devices used to reduce HAP emissions to the atmosphere.

a. Reduce THC emissions (as carbon, and minus methane if you wish to subtract methane) by 90 percent.

b. Reduce methanol emissions by 90 percent.

c. Reduce formaldehyde emissions by 90 percent.

d. Limit the concentration of THC (as carbon, and minus methane if you wish to subtract methane) in the outlet of the add-on control system to 20 parts per million by volume, dry basis (ppmvd).

e. Limit the concentration of methanol in the exhaust from the add-on control system to 1 ppmvd (can be used only if the concentration of methanol entering the control device is greater than or equal to 10 ppmvd).

f. Limit the concentration of formaldehyde in the exhaust from the add-on control system to 1 ppmvd (can be used only if the concentration of formaldehyde entering the control device is greater than or equal to 10 ppmvd).

In the first three options (a through c), the 90 percent control efficiency represents a total control efficiency. Total control efficiency is defined as the product of the capture efficiency and the control device efficiency. For process units such as rotary strand dryers, capture efficiency is not an issue because the rotary strand dryer has a single exhaust point which is easily captured by the control device. However, for presses and board coolers, the HAP emissions cannot be completely captured without installing an enclosure. If the enclosure meets the criteria for a permanent total enclosure (PTE) as described in EPA Test Method 204 (40 CFR part 51, appendix M), then you could assign the enclosure a capture efficiency of 100 percent. You would have to test other enclosures to determine capture efficiency using EPA Test Methods 204 and 204A through 204F (as appropriate) or the alternative