

representative range of materials (*e.g.*, wood material of a typical species mix and moisture content, typical resin formulations) and operating the process unit at typical operating temperature ranges.

4. Work Practice Requirements

The work practice requirements in today's proposed rule do not require you to conduct any initial performance tests. To demonstrate initial compliance with the work practice requirements for dry rotary dryers, you would have to install parameter monitoring devices to continuously monitor the dryer inlet operating temperature and the moisture content (dry basis) of the wood furnish (*i.e.*, wood fibers, particles, or strands used for making board) entering the dryer. You would then use the parameter monitoring devices to continuously monitor and record the dryer temperature and wood furnish moisture content for a minimum of 30 days. If the monitoring data indicate that during the minimum 30-day demonstration period, your dry rotary dryer continuously processed wood furnish with an inlet moisture content less than or equal to 30 percent, and the dryer was continuously operated at an inlet dryer temperature less than or equal to 600 °F, then your dryer would meet the definition of a dry rotary dryer in today's proposed rule. You would submit the monitoring data as part of your notification of compliance status report.

To demonstrate initial compliance with the work practice requirements for hardwood veneer dryers, you would have to calculate the annualized percentage of softwood veneer processed in the dryer by volume, using veneer dryer production records for the 12-month period prior to the compliance date. If the total annual percentage by volume of softwood veneer is less than 30 percent, your veneer dryer would meet the definition of hardwood veneer dryer. You would then submit a summary of the production data for the 12-month period and a statement verifying that the veneer dryer will continue to process less than 30 percent softwoods as part of your notification of compliance status report.

To demonstrate initial compliance with the work practice requirements for softwood veneer dryers, you would have to develop a plan for minimizing fugitive emissions from the veneer dryer green end and heated zones. You would submit the plan with your notification of compliance status report.

To demonstrate initial compliance with the work practice requirements for

veneer redryers, you would have to install a device that can be used to continuously monitor the moisture content (dry basis) of veneer entering the dryer. You would then use the moisture monitoring device to continuously monitor and record the inlet moisture content of the veneer for a minimum of 30 days. If the monitoring data indicate that your veneer dryer continuously processed veneer with a moisture content less than or equal to 25 percent during the minimum 30-day demonstration period, then your veneer dryer would meet the definition of a veneer redryer in today's proposed rule. You would submit the monitoring data as part of your notification of compliance status report.

H. How Do I Demonstrate Continuous Compliance With This Proposed Rule?

The continuous compliance requirements in today's proposed rule vary with the different types of compliance options.

1. Production-Based Compliance Options

If you comply with the production-based compliance options, then you would have to install a continuous parameter monitoring system (CPMS) to monitor the process operating parameter(s) used to demonstrate compliance with the operating requirements in today's proposed rule. Your CPMS would have to collect data at least every 15 minutes, and you would need to have at least three data points per hour to have a valid hour of data. You would have to operate the CPMS at all times the process unit is operating. You also would have to conduct proper maintenance of the CPMS and maintain an inventory of necessary parts for routine repairs of the CPMS. Using the data collected with the CPMS, you would calculate and record the 3-hour block average values of each process operating parameter.

The process operating parameter you would monitor for green rotary dryers, tube dryers, and strand dryers is dryer inlet temperature. The process operating parameter you would monitor for hardboard ovens, press predryers, reconstituted wood product presses, fiberboard mat dryer hot zones, and softwood veneer dryer hot zones is operating temperature. You would not be required to monitor process parameters for reconstituted wood product board coolers or pressurized refiners. For each temperature parameter, you would have to continuously maintain the 3-hour block average temperature below the

maximum temperature established during the performance test.

Instead of operating a CPMS, you could choose to operate a CEMS for monitoring THC concentration to demonstrate compliance with the operating requirements in today's proposed rule. If you choose to operate a THC CEMS in lieu of a CPMS, you would have to demonstrate continuous compliance as described in the following subsection.

2. Add-On Control System Compliance Options

For add-on control systems, you would have to install a CPMS to monitor the specified control device operating parameter(s) or install a CEMS to monitor THC concentration to demonstrate compliance with the operating requirements in today's proposed rule. If you operate a CPMS, it would have to collect data at least every 15 minutes, and you would need to have at least three data points per hour to have a valid hour of data. You would have to operate the CPMS at all times the process unit is operating. You also would have to conduct proper maintenance of the CPMS and maintain an inventory of necessary parts for routine repairs of the CPMS. Using the data collected with the CPMS, you would calculate and record the average values of each operating parameter according to the specified averaging times.

For thermal oxidizers, you would have to continuously maintain the 3-hour block average firebox temperature at or above the minimum temperature established during the performance test. For catalytic oxidizers, you would have to continuously maintain the 3-hour block average temperature upstream of the catalyst bed at or above the minimum value established during the performance test. For both thermal and catalytic oxidizers, you would also have to continuously maintain the 3-hour block average static pressure at the inlet of the thermal oxidizer within the operating range established during the performance test. As an alternative to monitoring static pressure, you may monitor gas flow rate at the oxidizer stack. If you monitor gas flow, you must maintain the 3-hour block average gas flow rate below the maximum flow rate established during the performance test.

For biofilters, you would have to maintain the gas temperature entering the biofilter, effluent pH, and pressure drop across the biofilter bed within the operating ranges you establish. You would establish your biofilter operating parameter limits, their monitoring frequencies, and their averaging times