

source includes, but is not limited to, those process units found in green end operations, drying operations, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other NESHAP). The affected source also includes onsite storage of raw materials used in the manufacture of PCWP, such as resins, onsite wastewater treatment operations specifically associated with PCWP manufacturing, and miscellaneous coating operations. The affected source includes lumber kilns at PCWP manufacturing facilities and at any other facility.

Miscellaneous coating operations are activities such as edge coating of PCWP, labeling and printing on PCWP, application of anti-skid coatings, putty/patching operations at plywood facilities, etc. Only those onsite miscellaneous coating operations at PCWP manufacturing facilities that are listed in § 63.2292 of today's proposed rule are covered by these proposed NESHAP. We specifically excluded these miscellaneous coatings operations from the proposed Wood Building Products Surface Coating NESHAP (40 CFR part 63, subpart QQQQ). We included these sources in the definition of affected source for PCWP because these miscellaneous coating operations are part of the PCWP manufacturing process and are performed at the same location.

To provide compliance flexibility, we defined the affected source as the combination of all of the process units at a PCWP manufacturing facility. Many of the PCWP facilities that already control HAP emissions to the levels that would be required in today's proposed rule do so by first combining emissions from different process units and then controlling the combined emissions in one or more emission control devices. Much of the control device efficiency data used to set the proposed compliance options for add-on control systems was based on control equipment that was used to control emissions from multiple types of process units. As a result, the required level of control would be the same for most types of process units. For example, the control level for new and existing reconstituted wood products presses would be the same as the control level for new and existing tube dryers. We believe that the proposed broad definition of affected source is consistent with the way the industry applies add-on control devices, and that it creates more meaningful

opportunities for emissions averaging. The affected source definition we selected is the same for both new and existing sources.

The affected source includes lumber kilns co-located at PCWP manufacturing facilities and lumber kilns at other facilities that do not manufacture PCWP (*i.e.*, stand-alone kiln-dried lumber manufacturing facilities such as sawmills). Wood products industry representatives requested that all lumber kilns (regardless of location) be considered in today's proposed rule so there would be one MACT determination for all lumber kilns nationwide.

If lumber kilns at stand-alone kiln-dried lumber manufacturing facilities are not included in the PCWP NESHAP, those stand-alone facilities could be listed as a major source category under section 112(c) of the CAA in the future and may be subject to the provisions of section 112(g) of the CAA as well. We believe no additional emissions reductions would be accomplished by listing lumber kilns as a separate source category or by having them regulated by case-by-case MACT. We believe this because: (1) The design and operation of lumber kilns are essentially the same regardless of whether the kilns are located at a sawmill or co-located with PCWP manufacturing operations, (2) we know of no lumber kilns that are controlled for HAP, and (3) we know of no cost effective HAP controls for lumber kilns. In addition, we know of no additional recordkeeping or reporting that stand-alone facilities would incur by being part of the PCWP source category since the PCWP source category includes only major sources. Including stand-alone kilns in the PCWP source category will save resources for regulatory agencies and industry and does not forego HAP reductions; therefore, we are proposing stand-alone kilns as part of the PCWP source category.

C. How Did We Determine the MACT Floor for Existing Sources?

Section 112(l)(3) of the CAA specifies that each MACT standard be at least as stringent as the floor for the sources in the relevant source category or subcategory. Today's proposed PCWP rule does not have subcategories; therefore, the average emission limitation achieved by the best-performing 12 percent of all major PCWP facilities represents the MACT floor for the source category. In order to rank the PCWP facilities based on performance, we would need facilitywide uncontrolled emissions data and facilitywide controlled

emissions data for each facility to determine the percent reduction in HAP emissions achieved by each facility. We do not have actual facilitywide emissions data; however, we have accurate and complete information on the type and number of individual process units at PCWP facilities. In addition, emissions data are based on process unit data. Therefore, we decided to apply the MACT floor methodology at the process-unit level. Our information is especially accurate and complete for dryers and presses, which are generally the highest-emitting process units and the ones most likely to have add-on control systems that reduce HAP emissions from PCWP facilities. With this approach, the sourcewide MACT floor is represented by the MACT floor level of control established for each process unit group. We believe that applying the MACT floor methodology to process unit groups results in the closest possible approximation of the true sourcewide MACT floor, since it better enables us to take into account process unit-specific emissions data. We do not believe the results from this approach are significantly different from what they would be if facilitywide source-specific data had been available.

We determined the MACT floor control level for existing sources using the following procedure:

- We reviewed available data on pollution prevention techniques and the performance of add-on control devices and identified those add-on control systems that were best at reducing HAP emissions;
- For each process unit group identified in Table 1 of this preamble, we ranked the process units in that group from the best performing to the worst performing based on the type of add-on control system applied to each process unit;
- For each process unit group, we then identified the add-on control system that represented the MACT floor technology; and
- Using available information on the performance of the add-on control systems, we determined the performance level of the add-on control systems.

This procedure is explained in more detail in the following paragraphs. Additional information on how we determined the proposed MACT floor for the PCWP industry is available in the docket for this rule (Docket Number A-98-44).

1. Identifying the Best-Performing Add-On Control Systems

Although we believe that the potential for pollution prevention exists for some