

such statistical methods, and the resulting compliance options, in many cases, seemed unreasonably high compared to the actual emissions from process units with MACT control systems. Therefore, statistical methods were not used. We based the production-based compliance options on total HAP emissions, as defined in today's proposed rule, because of the variability in uncontrolled HAP emissions within and among the different types of process units. Total HAP emissions varied less than the emissions of individual HAP and the emissions of THC.

## 2. Add-On Control System Compliance Options

The six compliance options for add-on control systems in today's proposed rule are based on the performance of incineration-based control systems and biofilters. We included two formats in these compliance options: Emissions reductions (percent) and maximum outlet pollutant concentrations. Many of the well-controlled facilities are already subject to permit limits that are in the form of a percent reduction in emissions. Therefore, we expect that some of those facilities may choose to comply with an emissions reduction option. We are also including outlet concentration options so that sources that have lower inlet pollutant concentrations (and thus, have lesser ability to achieve higher emissions reductions) can demonstrate compliance. We consider the emissions reduction options and the outlet concentration options to be equivalent limits. We are not requiring an oxygen correction to the outlet concentration options because most of our outlet concentration data were measured at ambient oxygen levels due to the relatively dilute emission streams being treated. Dilution to achieve compliance with the proposed PCWP rule is prohibited by 40 CFR 63.4.

We are restricting the use of the formaldehyde and methanol concentration-based options to only those sources with formaldehyde or methanol emissions entering the control device that are greater than 10 ppmvd. We have included this restriction to prevent circumvention of the proposed standards. For example, if a process unit emits primarily formaldehyde and only a very small amount of methanol (slightly less than 1 ppmvd), without the 10 ppmvd restriction, you could demonstrate compliance with the 1 ppmvd methanol concentration option without using a control system or using a control system that does not reduce HAP, such as a baghouse. The 10

ppmvd restriction does not apply to the percent reduction compliance options.

## 3. Emissions Averaging Compliance Option

Today's proposed rule includes an emissions averaging compliance option because we believe that emissions averaging represents an equivalent, more flexible, and less costly alternative to controlling certain emission points to MACT floor levels. Prior to an industry-sponsored emissions test program carried out by NCASI, the majority of the available emissions test data for the PCWP industry was limited to THC and formaldehyde emissions data for dryers and presses. The industry-sponsored test program provided speciated HAP emissions data for a variety of process units at 29 different PCWP plants. For some of these previously untested process units, the NCASI data represent the only available HAP emissions data for those sources. A few of these process units, such as blenders, may emit quantities of HAP equal to or greater than the quantities emitted from some types of dryers and presses. In addition to emitting more HAP, these other types of process units often have a lower volume of exhaust gas to be treated compared to dryers and presses. The combination of higher pollutant concentrations and lower exhaust gas flow rates may make these other process units more cost effective to control. However, very few PCWP facilities have installed emission control devices on process units other than dryers and presses. Therefore, when determining the MACT floors for existing process units, the process units most likely to have controlled MACT floors have been dryers and presses, with some exceptions. Most other types of process units are largely uncontrolled throughout the industry and based on our MACT analysis, we did not include existing source control requirements for these process units in today's proposed rule. Therefore, emissions from these other types of process units at existing sources would not be controlled under the point-by-point compliance options in today's proposed rule. By allowing emissions averaging across the affected source, which is broadly defined in today's proposed rule, sources can achieve the same environmental gains as point-by-point compliance, but at reduced cost.

The emissions averaging provisions in today's proposed rule are based in part on the emissions averaging provisions in the Hazardous Organic NESHAP (HON). The legal basis and rationale for the HON emissions averaging provisions were provided in the preamble to the

final HON (59 FR 19425, April 22, 1994). The rationale for including certain limitations and requirements as part of today's emissions averaging provisions follows the HON and is summarized below.

*Emission points allowed in emissions averaging.* Only those emission points (process units) that are part of the affected source (PCWP manufacturing facility), as defined in today's proposed rule, can be included in an emissions average. Therefore, a PCWP facility collocated with a pulp and paper mill, for example, cannot include emission points in the pulp and paper mill as part of the emissions average.

Today's proposed rule also excludes new affected sources from the proposed emissions averaging provisions. Today's proposed rule defines affected sources broadly, such that a new source is essentially a whole new "green field" mill. Therefore, not allowing emissions averaging at new sources does not affect existing sources' ability to use emissions averaging. New sources have historically been held to a stricter standard than existing sources because it is most cost effective to integrate state-of-the-art controls into equipment design and to install the technology during construction of new sources. One reason we allow emissions averaging is to give existing sources flexibility to achieve compliance at diverse points with varying degrees of control already in place in the most cost-effective and technically reasonable fashion. This concern does not apply to new sources which can be designed and constructed with compliance in mind.

Today's proposed rule also excludes from emissions averaging any process units equipped with emission control systems that were installed to comply with a State or Federal rule or statute (other than today's proposed rule). We are including this restriction because credits for controls applied to comply with another rule increase your ability to generate credits, but do not generate any new emissions reductions, thus creating more emissions. However, if a process unit in your approved EAP used to generate emission credits later becomes subject to a State or Federal rule other than the proposed PCWP rule, the process unit can continue to generate credits in the approved plan. Work practice requirements are excluded from emissions averaging because, by definition, the level of emissions reduction achieved by compliance with those requirements is not sufficiently quantifiable.

*Limits on credit for control efficiencies.* The proposed emissions averaging provisions limit the value of