

the control system efficiency (CD_i) to 90 percent in the equation for calculating the AMR of total HAP from all process units generating credits. No credit above 90 percent is allowed.

Differences from the HON emissions averaging approach. Some aspects of the HON emissions averaging approach have not been included in the proposed PCWP rule. Specifically, today's proposed rule does not limit the number of emission points allowed in an emissions average, does not require a hazard or risk analysis, and does not include a discount factor. The HON limited the number of emission points that could be used in an emissions average because of significant enforcement concerns. The HON sources have many emission points, are complex and diverse, and as a result are subject to a more complex set of emissions averaging provisions. The PCWP facilities have fewer emission points within each facility. Therefore, the enforcement concerns arising due to the large number of emission points in each HON facility are minimized for PCWP facilities. As a result, we believe a simpler set of emissions averaging provisions is appropriate for PCWP facilities, and the limitation on the number of points available for averaging was not included in the proposed rule.

The HON requires a hazard and risk study for emission points included in an emissions average largely because of the many pollutants and many emission points at the source. The PCWP facilities have fewer pollutants of concern and are likely to have similar HAP emissions from the emission points that would be used to generate debits and credits. Thus, we believe that averages will achieve a comparable hazard/risk benefit as point-by-point compliance. Although States would still have the discretion to require a PCWP facility that requested approval of an emissions average to conduct a hazard and risk study (or preclude the facility from using emissions averaging altogether), the proposed rule does not require a hazard or risk study.

The HON requires a discount factor of 10 percent in credit calculations to share with the environment some portion of the cost savings due to emissions averaging and to account for uncertainty in emissions estimation. Due to differences between PCWP and HON sources (discussed below), we do not believe it is necessary for the proposed PCWP rule to include a discount factor.

The HON proposal preamble (57 FR 62652, December 31, 1992) and the HON final preamble discuss how cost savings due to emissions averaging

should be shared between industry and the environment. For the HON, we decided that it was appropriate that industry share any cost savings realized from emissions averaging and included a discount factor because the costs of controlling different emission points could vary significantly. The HON proposal preamble also discussed the level of uncertainty in estimating emissions reductions that may result from facilities using emissions averaging. For the HON, the uncertainty arose from differing accuracies available for estimating emissions from the number of emission points at a HON facility, the number of HAP emitted from HON facilities, and the different types of emission points.

The PCWP industry differs in almost every relevant factor from the HON. First, HON facilities can cover several square miles and some emission points, such as storage vessels, could be some distance from other emission points making them relatively costly to control. Second, as discussed previously, the number of points that might be included in an emissions average at a PCWP facility is fewer than could be included in a HON average and, therefore, less of a concern. Third, the magnitude of emissions from HON emission points is typically much greater than the emissions from PCWP emission points. Fourth, there are six HAP of primary concern emitted from PCWP facilities compared to over 140 HAP emitted from HON facilities. Fifth, the kinds of emission points found at PCWP facilities are much more similar than those regulated by the HON and, therefore, unlikely to introduce additional uncertainty.

We believe the inclusion of emissions averaging into rules and the decision on how to design an emission averaging approach for a particular source category must be evaluated for each source category. Although the HON and the proposed PCWP rule share the same legal basis for including emission averaging as a compliance option and the same basic system of credits and debits, some of the restrictions reasonable for the HON emissions averaging provisions are unnecessary for the proposed PCWP rule.

4. Work Practice Requirements

Section 112(h) of the CAA states that “* * * if it is not feasible in the judgement of the Administrator to prescribe or enforce an emission standard for control of a hazardous air pollutant or pollutants, the Administrator may, in lieu thereof, promulgate a design, equipment, work practice, or operational standard, or

combination thereof * * *” Section 112(h)(2) further defines the phrase “not feasible to prescribe or enforce an emission standard” as any situation in which “* * * a hazardous air pollutant or pollutants cannot be emitted through a conveyance designed and constructed to emit or capture such pollutant, * * * or the application of measurement methodology to a particular class of sources is not practicable * * *”

Today's proposed rule includes work practice requirements for softwood veneer dryers, dry rotary dryers, hardwood veneer dryers, and veneer redryers. The proposed work practice requirements for softwood veneer dryers include a requirement to minimize fugitive emissions from the veneer dryer doors and the green end of the dryer. It is not practical for sources to measure the fugitive emissions from the softwood veneer dryers; therefore, in lieu of establishing an emission limit for fugitive emissions, we are proposing that sources develop a plan for minimizing these emissions and keep records to document they are following their plan.

For dry rotary dryers, hardwood veneer dryers, and veneer redryers, the proposed work practice requirements would establish limits on how these process units are operated and the types of materials processed in these units. The MACT floors for dry rotary dryers, hardwood veneer dryers and veneer redryers are all equivalent to no emissions reductions because none of these process units have add-on control devices. The emissions from these three types of process units are relatively low compared to the emissions from other PCWP process units subject to today's proposed rule. However, if these three types of process units were operated in a manner that was inconsistent with how they are defined in today's proposed rule, the emissions from these process units could increase.

For example, a green rotary dryer, which has proposed compliance options in today's proposed rule, is essentially the same in terms of equipment as a dry rotary dryer. However, a dry rotary dryer emits much less HAP than a green rotary dryer because it dries wood particles that have been previously dried to some extent; thus, much of the HAP present in the wood has already been released. The dry rotary dryers also operate at lower temperatures, which further reduces the amount of HAP emitted. Therefore, the operation of the rotary dryer, and not the equipment design, determines whether it is classified as a green or dry rotary dryer. Because the dry rotary dryers, veneer redryers and hardwood veneer dryers