

are defined and classified based on how they are operated, and we made MACT floor determinations based on those classifications, we believe that proposing work practice requirements (such as continuously monitoring dryer temperature and wood moisture content) that ensure that these process units continuously operate as defined in today's proposed rule is more appropriate than proposing compliance options for these process units.

*G. How Did We Select the Test Methods for Determining Compliance With the Proposed Rule?*

Today's proposed rule would require you to conduct performance tests to demonstrate compliance with the production-based compliance options, compliance options for add-on control devices, and the emissions averaging alternative. Depending upon which compliance option you use, you would be required to measure emissions of methanol, formaldehyde, THC, or total HAP. When determining compliance with compliance options for presses and board coolers, you also would be required to determine the capture efficiency of the enclosures for those presses and board coolers that have enclosures that do not qualify as PTE. For presses and board coolers that have partial enclosures or no enclosures, you must determine the capture efficiency of the emissions capture device by installing a TTE as described in EPA Method 204 or using the tracer gas method as described in Appendix A to today's proposed rule. The test methods you would have to use to measure these pollutants and capture efficiency are discussed below.

We are proposing the use of EPA Method 25A (Determination of Total Gaseous Organic Matter Concentration Using a Flame Ionization Analyzer) for measuring THC emissions because most of the PCWP facilities that are already required to measure THC emissions use this method. Also, most of the available emissions data that we used to establish THC control efficiencies for the various control systems were measured using Method 25A and reported on an "as carbon" basis. Method 25A is better suited than EPA Method 25 (Measurement of Total Gaseous Nonmethane Organic Emissions as Carbon (TGNMO)) for measuring emission streams from PCWP process units which typically have lower THC concentrations (e.g., less than 50 ppm) and relatively high moisture contents. However, unlike Method 25, Method 25A does measure methane as a THC. Because many of the well-controlled PCWP facilities are required by permit

to reduce VOC emissions, these facilities generally are allowed to subtract methane emissions from the THC measurement when reporting VOC emissions because methane is not a VOC, according to EPA's definition of VOC. Therefore, we also would allow you to subtract methane emissions from measured THC values using EPA Method 18 (Measurement of Gaseous Organic Compound Emissions by Gas Chromatography). Method 18 is a self-validating method.

We are proposing the use of the NCASI Method (NCASI Method CI/WP-98.01, Chilled Impinger Method for Use at Wood Products Mills to Measure Formaldehyde, Methanol, and Phenol, 1998) for measuring methanol or formaldehyde. We are also proposing the NCASI Chilled Impinger Canister Method (NCASI Method IM/CAN/WP-99.01) for measuring total HAP emissions. Total HAP emissions are defined, for purposes of today's proposed rule, as the sum of the emissions of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The NCASI Chilled Impinger Method (NCASI Method CI/WP-98.01), which we are proposing to incorporate by reference, has been validated (using EPA Method 301 criteria) for measuring formaldehyde, methanol, and phenol from dryers and press vents at PCWP facilities. The NCASI Method IM/CAN/WP-99.01, which we are proposing to incorporate by reference (pending EPA review of the method), is a self-validating method that can be used to measure numerous HAP compounds.

As an alternative to the NCASI methods, we are proposing use of other applicable EPA test methods in order to increase the flexibility of the proposed rule. You could use EPA Method 320 (Measurement of Vapor Phase Organic and Inorganic Emission by Extractive FTIR) to measure emissions of methanol, formaldehyde and total HAP. Method 320 is a self-validating method that uses Fourier transform infrared (FTIR) spectroscopy. You could also use EPA Method 308 (Procedure for Determination of Methanol Emission from Stationary Sources) for measuring emissions of methanol. Method 308 predates the NCASI Chilled Impinger Method and the NCASI Impinger Canister Method and has been used to test PCWP emission sources in the past. You could use EPA Method 0011 (Sampling for Selected Aldehyde and Ketone Emissions from Stationary Sources) or EPA Method 316 (Sampling and Analysis for Formaldehyde Emissions from Stationary Sources in the Mineral Wool and Wool Fiberglass

Industries) to measure formaldehyde emissions. Although EPA Method 0011 has not been validated for use in the PCWP industry, it predates the NCASI methods and EPA Method 320 and is frequently used to measure formaldehyde emissions from PCWP process units. A comparison of formaldehyde measurements made using the NCASI methods and EPA Method 0011 showed no significant differences (see Docket number A-98-44); therefore, we would allow you to use EPA Method 0011 as an alternative to the NCASI Methods for measuring formaldehyde. Although EPA Method 316 has not been validated for testing of PCWP process units, it is a relatively new method for measuring formaldehyde concentrations as low as 11 parts per billion. Therefore, it is included as an alternative to the other test methods for formaldehyde in today's proposed rule.

We are proposing the use of EPA Method 204 (Criteria for and Verification of Permanent or Temporary Total Enclosure) and Methods 204A through 204F for determining the capture efficiency of enclosures. Methods 204A through 204F include the following: Method 204A—Volatile Organic Compounds Content In Liquids Input Stream; Method 204B—Volatile Organic Compounds Emissions In Captured Stream; Method 204C—Volatile Organic Compounds Emissions In Captured Stream (Dilution Technique); Method 204D—Volatile Organic Compounds Emissions In Uncaptured Stream From Temporary Total Enclosure; Method 204E—Volatile Organic Compounds Emissions In Uncaptured Stream From Building Enclosure; and Method 204F—Volatile Organic Compounds Content In Liquid Input Stream (Distillation Approach). If the enclosure meets the definition and criteria in EPA Method 204 for a PTE, then you may assume that its capture efficiency is 100 percent. If the enclosure is not a PTE, then you would have to build a total temporary enclosure (TTE) around the process unit that meets the definition of a TTE in EPA Method 204, and you would be required to determine the capture efficiency of the TTE using Methods 204A through 204F (as appropriate). You would then have to measure emissions from both the control device (if applicable) and the TTE and use the combined emissions to determine compliance. If the process unit is uncontrolled, you would have to use the capture efficiency of the TTE in determining the uncontrolled emissions from the process unit.