

Industry representatives have expressed concern with using EPA Methods 204 and 204A through F for determining capture efficiency of press enclosures. The industry representatives have indicated that some facilities may have difficulty retrofitting a PTE or TTE that meets the EPA Method 204 criteria. Partial enclosures may be able to achieve high capture. We recognize the need for flexibility in determining capture efficiency for PCWP press enclosures and, therefore, as an alternative to Methods 204 and 204A through F, we are working with PCWP industry representatives to develop and propose a tracer gas procedure that may be used to determine the capture efficiency of PCWP press partial enclosures. This alternative tracer gas procedure is provided as Appendix A to today's proposed rule. This procedure would be applicable for determination of capture efficiency for press enclosures that are not considered to be PTE as defined in EPA Method 204, and the procedure is proposed as an alternative to the construction of TTE. Sulfur hexafluoride (SF₆) is used as a tracer gas. This gas is not indigenous to the ambient atmosphere and is nonreactive. The alternative tracer gas procedure provided as Appendix A to today's proposed rule is a "work in progress." Industry representatives are testing the tracer gas procedure and are expected to provide data and feedback that may be used in revising the procedure if necessary. Discussions with industry representatives regarding development of the proposed alternative tracer gas procedure are documented in Docket A-98-44. We welcome your comments on the proposed alternative tracer gas procedure. We also welcome your comments on additional approaches for determining capture efficiency, such as the use of computational fluid dynamics (CFD) models or other methods that would meet the data quality objective (DQO) or lower confidence limit (LCL) statistical criteria outlined in Appendix A to subpart KK of 40 CFR part 63 (National Emission Standards for the Printing and Publishing Industry). Today's proposed rule would allow facilities to petition the Administrator for use of alternative test methods.

H. How Did We Select the Monitoring and Recordkeeping Requirements?

We are proposing monitoring and recordkeeping requirements based on a combination of general monitoring and recordkeeping requirements in the NESHAP General Provisions (40 CFR part 63, subpart A) and specific monitoring methods already in use at

PCWP plants. The proposed monitoring requirements we selected pertain to the operating requirements for control devices and the work practice requirements for various dryers.

The proposed recordkeeping requirements include submitting a copy of each notification and report, as well as documentation supporting any Initial Notification or Notification of Compliance Status, according to the requirements in § 63.10(b)(2)(xiv). You would also have to keep the records specified in § 63.6(e)(3) related to startup, shutdown, and malfunction (SSM), records of performance tests, as required in § 63.7(g)(1), and records for each continuous monitoring system (CMS), including CPMS or CEMS. The records for the CMS would include records of the applicable operating requirements and monitoring data required in today's proposed rule. You also would have to keep records to demonstrate compliance with any work practice requirements that apply to you.

How we selected the specific proposed monitoring and recordkeeping requirements is discussed in the following subsections.

1. Control Device Parameter Monitoring and Recordkeeping Requirements

According to today's proposed rule, you would have the option of either monitoring control device operating parameters or operating a THC CEMS at the control device outlet to demonstrate continuous compliance with the operating requirements. The operating parameters for thermal oxidizers, catalytic oxidizers, and biofilters were selected based on information from the questionnaire responses and information from other source categories regarding the parameters that are currently used as reliable indicators of control device performance.

For thermal oxidizers, we would require monitoring for the temperature in the firebox or in the ductwork immediately downstream of the firebox. A sufficiently high temperature in the firebox helps to ensure complete combustion of pollutants. We also would require you to monitor the static pressure at the inlet of the thermal oxidizer as an indicator of capture efficiency and the process unit exhaust flow rate entering the thermal oxidizer. You may monitor gas flow rate at the thermal oxidizer stack as an alternative to monitoring static pressure. Monitoring of gas flow or static pressure can alert the operator to problems such as plugging of the thermal oxidizer. Parameter monitoring would not be required for combustion units with greater than or equal to 44 MW heat

input capacity that accept process exhausts into the flame zone.

For catalytic oxidizers, we would require monitoring of the temperature at the inlet of the catalyst bed. The rate at which pollutants in the exhaust stream are oxidized on the catalyst is greatly affected by temperature, as well as other parameters (such as residence time and turbulence) that are fixed by the design of the catalytic oxidizer. Monitoring of the inlet temperature to the catalytic oxidizer helps to ensure that the system is operating as designed with a temperature high enough to oxidize the pollutants. As for thermal oxidizers, we also would require you to monitor the static pressure at the inlet of the catalytic oxidizer or stack gas flow rate.

If you operate a thermal oxidizer or catalytic oxidizer, you would be required to calculate and record 3-hour block averages of the operating parameter values. We selected the 3-hour averaging time because the initial performance test provisions in today's proposed rule require you to perform a minimum of three 1-hour test runs, and the control device operating requirements would be based on the average values obtained using all test data obtained during the performance test. Each 3-hour average parameter value must remain within the level established during the performance test in order for you to demonstrate continuous compliance with the operating requirement.

The proposed operating parameters for biofilters are based on information about parameters currently monitored for biofilters operated in the PCWP industry and on information supplied by a biofilter vendor. For biofilters, you would be required to monitor the following parameters to demonstrate continuous compliance: (1) Temperature of the air stream entering the biofilter, (2) pressure drop across the media bed, and (3) pH of the effluent. Monitoring temperature and pH help determine the health of the microorganism population. Extremes in either temperature or pH can slow or halt microbial activity. Monitoring the pressure drop across the biofilter can alert the operator to problems such as plugging or drying of the bed media. Because factors that affect the performance of biofilters and biofilter monitoring methods can be site specific, you would be allowed to establish your biofilter operating parameter requirements and their corresponding monitoring methods, monitoring frequencies, and averaging times based on historical biofilter operating records. We allow the use of historical records in setting the biofilter parameter limits