

because establishing limits during a 3-hour performance test may not adequately identify acceptable operating ranges for biofilter parameters. Some facilities in the PCWP industry have been operating biofilters for years, and these facilities have learned through experience the most appropriate monitoring methods, monitoring frequencies, and optimal operating ranges for their biofilters. Because historical biofilter operating records may not be available for some biofilters (such as new biofilter installations), today's proposed rule would allow up to 180 days following the compliance date for the necessary operating data to be gathered for use in setting parameter requirements. To ensure compliance, all historical operating data used to establish the operating parameter limits must be accompanied by performance test data for the same time period that show that the biofilter was meeting the emission limits in today's proposed rule, and that the data were collected using the test methods in today's proposed rule. In addition, you would have to certify that no modifications have been made to the biofilter or associated process unit(s) subsequent to the date the historical data were collected. Because there are only a few biofilters operating in the PCWP industry and we have limited information on how changes in biofilter operating parameters affect biofilter performance, we welcome your comments on these proposed monitoring requirements for biofilters.

If you operate a control device other than a thermal oxidizer, catalytic oxidizer, or biofilter, you would be required to petition the Administrator for site-specific operating parameters to indicate proper operation and continued performance of the control device. You would establish the operating parameter values during the performance test and maintain the parameters within the range established during the performance test. The Administrator would determine whether maximum value, minimum value, or a range of operating parameters is appropriate. The Administrator would also determine the appropriate averaging time for each monitoring parameter for the control device.

If you comply with the production-based compliance options, then you would be required to continuously monitor a process operating parameter (temperature). You would monitor dryer inlet temperature for green rotary dryers, tube dryers, or strand dryers. You would monitor operating temperature for hardboard ovens, press predryers, reconstituted wood product

presses, fiberboard mat dryer hot zones, and softwood veneer dryer hot zones. You would not be required to monitor process parameters for reconstituted wood product board coolers or pressurized refiners. We request comment on whether the temperature parameters are appropriate for monitoring to show compliance with the production-based compliance options. The production-based compliance options were developed for inherently low-emitting process units or process units using pollution prevention. We believe that process unit HAP emissions are somewhat dependent on dryer or press temperature; however, other factors such as resin HAP content and percent of furnish that enters the plant already dried may also affect HAP emissions. It is not clear what pollution prevention techniques will be used to comply with the production-based compliance options (partly because pollution prevention measures are expected to evolve in the future), therefore, we request your feedback on how facilities that will use pollution prevention could show continuous compliance with the production-based compliance options.

Instead of monitoring process or control system operating parameters for thermal oxidizers, catalytic oxidizers, biofilters, or other control systems, you could choose to monitor THC concentration with a CEMS at the control device outlet to show compliance with the operating requirements. If you use a THC CEMS, you would be required to maintain the average THC concentration at the control device outlet below the maximum THC concentration established during the performance test. The purpose of monitoring THC concentration is to show compliance with the operating requirements (as opposed to the compliance options); thus, you could use the THC CEMS instead of CPMS regardless of whether you demonstrate compliance with the THC, formaldehyde, methanol, or total HAP compliance options. For example, you could conduct a performance test to show that you reduce formaldehyde by 90 percent while simultaneously operating the THC CEMS to determine the maximum 3-hour block outlet THC concentration that would become your parameter value representing your operating requirement. Generally, the same parameters that affect control device formaldehyde, methanol, or total HAP reduction efficiency also impact the THC reduction efficiency; thus, we believe that allowing use of a THC CEMS instead of a operating CPMS to

demonstrate continuous compliance with the operating requirements is appropriate. If you choose to do so, you may subtract methane from the THC concentration measured with your THC CEMS (e.g., by using a CEMS that measures TGNMO).

Control device maintenance requirements vary significantly from facility to facility. Although we believe that most of the maintenance activities can be accomplished during scheduled facilitywide or partial shutdowns, we recognize that some facilities may need to perform more maintenance on their control systems than other facilities due to site-specific factors, such as the nature and quantity of particulate entering an RTO or the ability of an RTO to perform online bakeouts (a feature often incorporated into newer RTO designs).

The most widely used add-on control systems at PCWP facilities are RTO, RCO, and biofilters. As with any control device in any industry, these control devices require routine maintenance. Routine maintenance includes activities such as cleaning or replacement of corroded parts, media replacement, bakeouts (RTO and RCO), washouts (RTO and RCO), and cleaning of ducts. Some PCWP drying processes release particulates and salts that can plug and weaken RTO and RCO media beds. Frequent bakeouts and washouts are necessary to combat the particulate and salt buildup. Partial or total media replacement is done when bakeouts and washouts are no longer effective.

Plywood and composite wood products industry representatives have requested that today's proposed rule include a downtime allowance that would allow process units to operate while the control device is offline for routine maintenance. After considering the available data, we included in today's proposed rule a routine control device maintenance exemption. To obtain the exemption, you must explain to the Administrator why you cannot perform routine control device maintenance during process shutdowns and describe how you plan to minimize emissions to the greatest extent possible during the maintenance. The routine control device maintenance exemption may not exceed 3 percent of annual operating uptime for each green rotary dryer, tube dryer, strand dryer, or pressurized refiner controlled. The routine control device maintenance exemption is limited to 0.5 percent of annual operating uptime for each softwood veneer dryer, reconstituted wood product press, reconstituted wood product board cooler, hardboard oven, press predryer, or fiberboard mat dryer