

controlled. If your control device is used to control a combination of equipment with different downtime allowances (e.g., a tube dryer and a press), then the highest (i.e., 3 percent) downtime allowance applies. The maximum percentages of operating time allowed for the routine control device maintenance exemption are based on our independent analysis of data from an extensive control device downtime survey conducted by the PCWP industry.

We are requesting comment on the appropriateness of including a routine control device maintenance exemption in today's proposed rule and whether or not the downtime allowance allotted is appropriate as the maximum amount of time per year for such an exemption. Commenters should submit information and data that support their comments such as detailed maintenance records and descriptions of the add-on control systems, sources controlled by the control system, and any particulate removal devices that precede the control system.

## 2. Monitoring and Recordkeeping Requirements for Process Units Without Add-On Control Devices

If you comply with the production-based compliance options in today's proposed rule without using an add-on control system, then you would be required to monitor and record process unit operating parameters. For most process units, temperature would be the required process monitoring parameter. Although HAP emissions vary within and among process units and no one process parameter is responsible for these variations, we selected temperature as the proposed required process monitoring parameter for most process units. We chose operating temperature because it affects HAP emissions and can be controlled and monitored relatively easily.

As for the control device operating requirements, you could choose to monitor THC concentration using a CEMS at the process unit outlet instead of monitoring process unit temperature. If you use a THC CEMS, you would be required to maintain the average THC concentration at the process unit outlet below the maximum THC concentration established during the performance test.

If you elect to use emissions averaging, you would not be required to monitor process parameters for those uncontrolled process units that are used to generate debits. However, when you determine the total HAP emissions from these uncontrolled process units, you would have to perform the emissions measurements under representative

operating conditions, and you would be required to keep records of the hours of operation for these uncontrolled process units.

## 3. Monitoring and Recordkeeping Requirements for Dry Rotary Dryer Work Practice Requirements

Rotary dryers that meet the definition of "dry rotary dryers" in today's proposed rule would not be subject to the proposed control requirements. Green rotary dryers and dry rotary dryers are essentially the same in terms of equipment design. The differences between the two types of dryers are operational. Green rotary dryers are used to dry green furnish, and dry rotary dryers are used to dry furnish that has been previously dried. Green rotary dryers are defined as dryers that dry wood particles that have a moisture content greater than 30 percent on a dry basis or operate at an inlet dryer temperature greater than 600° F. Conversely, dry rotary dryers dry wood particles that have a moisture content less than or equal to 30 percent on a dry basis and operate at an inlet dryer temperature less than or equal to 600° F. The 30 percent moisture and 600° F values were selected for the definitions of dry and green rotary dryers based on values reported in literature, in the questionnaire responses, and in the emissions test reports.

Because the differences in dry rotary dryers and green rotary dryers are operational, we are including monitoring requirements for dry rotary dryers in today's proposed rule that would ensure that these dryers operate as dry rotary dryers on a continuous basis. If you own or operate a dry rotary dryer, you would be required to continuously monitor, calculate, and record the 24-hour average dryer inlet temperature and the 24-hour average moisture content of the incoming wood particles. In addition to monitoring dryer inlet temperature and furnish moisture, you would be required to take representative grab samples of wood particles at the dryer inlet once each day of dryer operation and manually determine the moisture content of the sample on a dry basis. We have included the grab sampling requirement as a means of checking the accuracy of the correlation between the moisture content measured by the continuous moisture sensor and the dry basis moisture content manually determined using a grab sample. The continuous moisture sensors measure moisture level as the ratio of the weight of water to the volume of wood (in the sensing zone). Today's proposed rule defines moisture content, on a dry basis, as the ratio of

the weight of water to the weight of dry wood, multiplied by 100.

The requirements for the continuous moisture sensor and the grab sample requirement are specified in § 63.2268(f). We plan to add performance specifications for the continuous moisture sensor to include such parameters as the amount of drift allowed. We request comment on drift and any other performance specifications that should be added to ensure moisture content is being measured accurately, to ensure flexibility in the type of continuous moisture sensor that can be used by a facility, and to ensure compliance and enforceability. We also plan to add specifications to the grab sample requirements, such as including the period of time a sample must maintain a constant weight. We request comment on what this period of time should be and any other specifications that should be added to ensure accurate and precise results.

However, if you choose or are required by some other regulatory action to install a control device designed to reduce VOC or HAP emissions from a dry rotary dryer, you would be exempted from the process monitoring requirements for dry rotary dryers in today's proposed rule.

## 4. Monitoring and Recordkeeping Requirements for Veneer Redryer Work Practice Requirements

Veneer dryers that meet the definition of "veneer redryers" in today's proposed rule would not be subject to the proposed control requirements. Like the differences between green and dry rotary particle dryers, the differences between veneer dryers and veneer redryers are operational. Veneer dryers are used to dry green veneer, and veneer redryers are used to redry veneer that has been previously dried but requires some additional moisture reduction. Thus, in today's proposed rule, veneer redryers are defined as veneer dryers with an inlet veneer moisture content of less than 25 percent (by weight, dry basis). The 25 percent value was selected as the criterion for distinguishing between veneer dryers and veneer redryers because 25 percent was the highest reported veneer dryer outlet moisture content in responses to a survey. If you own or operate a veneer redryer, you would be required to continuously monitor, calculate, and record the 24-hour average inlet veneer moisture content to show that you continuously meet the definition of a veneer redryer.

For purposes of today's proposed rule, process units heated by microwaves or