

TABLE 3.—SUMMARY OF CAPITAL AND ANNUAL COSTS FOR NEW AND EXISTING SOURCES—Continued

Source	Subcategory	Estimated/ projected number of affected units	Annualized cost (10 <sup>6</sup> \$/yr)	Capital costs (10 <sup>6</sup> \$)
New Units .....	Large solid units .....	211	10	21
	Small solid units .....	25	3	3
	Limited use solid units .....	11	1	1
	Large liquid units .....	90	1	3
	Small liquid units .....	164	0	0
	Limited use liquid units .....	51	0.3	2
	Gaseous units .....	3,463	11	51

Using Department of Energy projections on fuel expenditures, the number of additional boilers that could be potentially constructed was estimated. The resulting total national cost impact of the proposed rule in the 5th year is 58 million dollars in capital expenditures and 18.6 million dollars per year in total annual costs. Costs are mainly for testing and monitoring.

A discussion of the methodology used to estimate cost impacts is presented in “Methodology and Results of Estimating the Cost of Complying with the Industrial, Commercial, and Institutional Boiler and Process Heater NESHAP” in the Docket.

*E. Can We Achieve the Goals of the Proposed Rule in a Less Costly Manner?*

We have made every effort in developing this proposal to minimize the cost to the regulated community and allow maximum flexibility in compliance options consistent with our statutory obligations. We recognize, however, that the proposal may still require some facilities to take costly steps to further control emissions even though those emissions may not result in exposures which could pose an excess individual lifetime cancer risk greater than one in one million or which exceed thresholds determined to provide an ample margin of safety for protecting public health and the environment from the effects of hazardous air pollutants. We are, therefore, specifically soliciting comment on whether there are further ways to structure the proposed rule to focus on the facilities which pose significant risks and avoid the imposition of high costs on facilities that pose little risk to public health and the environment.

Representatives of the plywood and composite wood products industry provided EPA with descriptions of three mechanisms that they believed could be used to implement more cost-effective reductions in risk. The docket for today's proposed rule contains white

papers prepared by industry that outline their proposed approaches. These approaches could be effective in focusing regulatory controls on facilities that pose significant risks and avoiding the imposition of high costs on facilities that pose little risk to public health or the environment, and we are seeking public comment on the utility of each of these approaches with respect to this rule.

One of the approaches, an applicability cutoff for threshold pollutants, would be implemented under the authority of CAA section 112(d)(4); the second approach, subcategorization and delisting, would be implemented under the authority of CAA sections 112(c)(1) and 112(c)(9); and, the third approach, would involve the use of a concentration-based applicability threshold. We are seeking comment on whether these approaches are legally justified and, if so, we ask for information that could be used to support such approaches.

The maximum achievable control technology, or MACT, program outlined in CAA section 112(d) is intended to reduce emissions of HAP through the application of MACT to major sources of toxic air pollutants. Section 112(c)(9) of the CAA is intended to allow EPA to avoid setting MACT standards for categories or subcategories of sources that pose less than a specified level of risk to public health and the environment. The EPA requests comment on whether the proposals described here appropriately rely on these provisions of CAA section 112. While both approaches focus on assessing the inhalation exposures of HAP emitted by a source, EPA specifically requests comment on the appropriateness and necessity of extending these approaches to account for non-inhalation exposures or to account for adverse environmental impacts. In addition to the specific requests for comment noted in this section, we are also interested in any information or comment concerning

technical limitations, environmental and cost impacts, compliance assurance, legal rationale, and implementation relevant to the identified approaches. We also request comment on appropriate practicable and verifiable methods to ensure that sources' emissions remain below levels that protect public health and the environment. We will evaluate all comments before determining whether either of the three approaches will be included in the final rule.

**1. Industry Emissions and Potential Health Effects**

To estimate the potential baseline risks posed by the Industrial Boiler and Process Heater source category, EPA performed a crude risk analysis of the source category that focused only on cancer risks. The results of the analysis are based on approaches for estimating cancer incidence that carry significant assumptions, uncertainties, and limitations. Based on the assessment, if the proposed rule is implemented at all facilities in the source category, cancer incidence in the U.S. may be reduced by as many as tens of cases per year. Due to the uncertainties associated with the analysis, this analysis should be regarded as one perspective on the estimate of annual cancer incidence reduction; the true risk reductions are unknown. (Details of this assessment are available in two memoranda in the docket: Memorandum on “Method for Approximate (“Top Down”) Estimates of Aggregate Cancer Risk Associated with Two Maximum Achievable Control Technology (MACT) Source Categories: Reciprocating Internal Combustion Engines (RICE) and Industrial/Commercial/Institutional Boilers” and Memorandum on “Additional Perspectives on (“Top Down”) Estimates of Aggregate Cancer Risk Associated with Industrial/Commercial/Institutional Boilers.”)