

#### *F. How Did We Select the Testing and Initial Compliance Requirements?*

The MACT levels of control can be achieved in several different ways. Many affected sources would be able to use low- or no-HAP coatings, although they may not be available to meet all needs. If an affected source also uses thinners containing organic HAP, it may be able to switch to widely available low- or no-HAP thinners to reduce organic HAP emissions to the MACT level of control. Other affected sources may use capture systems and add-on control devices, either alone or in combination with low- HAP coatings, to reduce emissions.

Reflecting those alternative approaches, the proposed standards would allow you to choose among several options to demonstrate compliance with the proposed standards for organic HAP, using coatings and thinners with low- or no-organic HAP, using a combination of low- or no-HAP coatings and emission capture and control devices, or using emission capture and control devices for all surface coating operations.

*For the Compliant Material Option.* You would be required to document the organic HAP content of all coatings and show that each is less than the applicable emission limit. You would also have to show that each thinner used contains no organic HAP. Method 311 is the method developed by EPA for determining the mass fraction of organic HAP in coatings and has been used in previous surface coating NESHAP. We have not identified any other methods that provide advantages over Method 311 for use in the proposed standards.

Method 24 is the method developed by EPA for determining the mass fraction of volatile matter for coatings and can optionally be used to determine the nonaqueous volatile matter content as a surrogate for organic HAP. In past standards, volatile organic compound (VOC) emission control measures have been implemented in coating industries with Method 24 as the compliance method. We have not identified any other methods that provide advantages over Method 24 for use in the proposed standards.

The proposed methods for determining volume fraction of coating solids are either ASTM Method D2697–86(1998) or ASTM Method D6093–97. Those are voluntary consensus standards (VCS) determined to be appropriate for the proposed rule; they represent the consensus of coating industry and other experts involved in their development.

For the Emission Rate Without Add-On Controls Option. To demonstrate initial compliance using that option, you would calculate the total organic HAP emission rate for all of your coating operation(s) in each subcategory and coating type segment. Total organic HAP emission rate is based on the total mass of organic HAP in all coatings and thinners and the total volume of coating solids used during the initial compliance period. You would be required to demonstrate that the organic HAP emission rate does not exceed the applicable emission limit using the methods discussed previously.

For the Emission Rate With Add-On Controls Option. If you use a capture system and control device, other than a solvent recovery device for which you conduct a monthly liquid-liquid material balance, you would be required to conduct an initial performance test of the system to determine its overall control efficiency. For a solvent recovery system for which you conduct a liquid-liquid material balance, you would determine the quantity of volatile matter applied and the quantity recovered during the initial compliance period to determine its overall control efficiency. The total monthly mass of organic HAP in all coatings and thinners used in each subcategory or coating segment with controls would be reduced by the overall control efficiency. That reduced value for total mass of organic HAP would then be used with the values from the preceding 11 months to calculate the 12-month rolling average organic HAP emission rate in kg HAP/liter of coating solids (lb HAP/gal of coating solids).

If you conduct a performance test, you would also determine parameter operating limits during the test. The test methods that the proposed standards would require for the performance test have been required under many standards of performance for industrial surface coating sources under 40 CFR part 60 and NESHAP under 40 CFR part 63. We have not identified any other methods that provide advantages over those methods.

For the Capture Efficiency/Outlet Concentration Option. If you use a capture system and control device other than a solvent recovery device for which you conduct a monthly liquid-liquid material balance, you would be required to conduct an initial performance test of the system to determine its overall control efficiency or the control device outlet concentration and meet the same initial compliance requirements described in Option 3.

#### *G. How Did We Select the Continuous Compliance Requirements?*

To demonstrate continuous compliance with the emission limits, you would need records of the quantity of coatings and thinners used and the data and calculations supporting your determination of their organic HAP content. If you conduct liquid-liquid material balances, you would need records of the quantity of volatile matter used and the quantity recovered by the solvent recovery systems each month.

To ensure continuous compliance with the proposed organic HAP emission limits and operating limits, the proposed standards would require continuous parameter monitoring of capture systems and control devices and recordkeeping. We selected the following requirements based on reasonable cost, ease of execution, and usefulness of the resulting data to both the owners or operators and EPA for ensuring continuous compliance with the emission limits and operating limits.

We are proposing that certain parameters be continuously monitored for the types of capture systems and control devices commonly used in the industry. Those monitoring parameters have been used in other standards for similar industries. The values of those parameters that correspond to compliance with the proposed emission limits are established during the initial or most recent performance test that demonstrates compliance. Those values are your operating limits for the capture system and control device.

You would be required to determine 3-hour average values for most monitored parameters for the affected source. We selected that averaging period to reflect operating conditions during the performance test to ensure the control system is continuously operating at the same or better control level as during a performance test demonstrating compliance with the emission limits.

#### *H. How Did We Select the Test Methods for Determining Compliance With the Emission Limits Using Add-On Control Devices?*

Today's proposed rule would require you to conduct performance tests to demonstrate compliance with the compliance options using add-on control devices. When determining compliance with options using add-on control devices, you also would be required to determine the capture efficiency of the associated enclosures if the enclosure does not qualify as a PTE. The test methods you would have to use to measure those pollutants and capture