

#### e. Site-Specific Data Revisions for Survey Facilities

EPA revised its questionnaire database to reflect detailed comments provided about specific facilities in EPA's questionnaire database. EPA uses information about facilities in the questionnaire database to estimate various costs and benefits (*e.g.*, compliance costs, pollutant reductions, economic impacts, non-water quality environmental impacts). For example, in some cases facilities that did not provide flow or production data for certain wastestreams at the time they submitted their questionnaire provided such information in their comments on the proposal or NODA. In other cases, facilities provided updated information about their: (1) Unit operations (*e.g.*, whether they currently have these UPs); (2) regulatory status (*e.g.*, whether they were currently covered by parts 413 or 433 regulations); (3) wastewater discharge status (*i.e.*, direct, indirect, or zero discharger); and (4) wastewater treatment technology.

As noted in section 3 of the TDD, EPA conducted several surveys, with the two major surveys occurring in 1990 and 1996. For proposal and NODA analyses EPA used both 1990 and 1996 as reference years to estimate costs and benefits associated with the various regulatory options. These two survey efforts provided information about the MP&M industry at two different times (*i.e.*, 1990 and 1996). Commentors suggested that EPA rely on more recent information and gave specific comments updating information concerning some facilities surveyed in the Phase I survey effort. EPA is using the later survey year, 1996, as the base year for the questionnaire database to more accurately reflect current conditions in the MP&M industry. EPA incorporated information about specific facilities from commentors into the questionnaire database when the information reflected facility conditions at or prior to 1996.

EPA did not incorporate information from commentors into its questionnaire database when the information reflected facility conditions post-1996. When commentors provided post-1996 information, EPA did, however, use this information for a sensitivity analysis for all subcategories where it is promulgating limitations or new source standards to assess recent trends in the industry. See DCN 17843, section 24.6.2, of the record for results and discussion of this sensitivity analysis.

#### f. Site Discharge Destination

EPA solicited comment in the NODA on its methodology for categorizing a

facility as either a direct discharger (to surface water), an indirect discharger (to a POTW), or a zero or alternative discharger (no wastewater is discharged) based on its questionnaire database. Facilities that are zero or alternative dischargers do not incur costs to comply with the regulation. For the January 2001 proposal and NODA, EPA identified direct dischargers as facilities that discharge any MP&M process wastewater to surface waters and calculated compliance costs and pollutant loadings and reductions for all MP&M process wastewaters as direct discharges. Commentors said that EPA should alter its methodology to allow facilities multiple discharge destinations rather than only assign a facility to a single category or discharge destination (*i.e.*, allow facilities with some streams discharging to a POTW and other streams to surface waters). Commentors also noted that EPA had misclassified some indirect dischargers as direct dischargers and provided examples.

EPA agrees with commentors that its methodology should address facilities with multiple wastewater discharge destinations. Consequently, EPA revised its methodology for the final rule to allow facilities that have multiple discharge destinations to be "split." For the purposes of estimating compliance costs and pollutant reductions, "splitting" a site means that EPA runs only those process wastewater streams that are discharged to the POTW through the EPA Cost & Loadings Model for indirect dischargers and runs only those process wastewater (not stormwater) streams that are discharged directly to surface waters through the model for direct dischargers. In addition to those facilities identified by commentors, EPA reviewed survey questionnaires for all facilities with multiple discharge destinations to determine if they should be designated as direct, indirect, or split (*see* DCN 17825, section 24.6.2).

In addition, in response to the comments that EPA incorrectly classified some facilities as direct dischargers, EPA also reviewed survey questionnaires for all facilities it had previously designated as direct to confirm their discharge status (*see* DCN 17826, section 24.6.2). This review altered the discharge status of a number of facilities (*see* section 11 of the final TDD for additional discussion of EPA's review). EPA's databases for the final rule reflects these changes. EPA also reviewed all direct discharges to ensure that EPA did not consider stormwater as a MP&M process wastewater in its

analysis of compliance costs and pollutant loadings.

#### g. Monitoring Costs

EPA revised its monitoring cost estimate for today's final rule to reflect the final list of regulated pollutants and monitoring frequencies. For example, as discussed in section IV.B of the NODA (*see* 67 FR 38767) and section 7 of the TDD, EPA is not regulating total sulfide, molybdenum, manganese, tin, or toxic organics. See section 11 of the TDD for today's final rule for a detailed discussion of EPA's monitoring cost estimates for each subcategory.

#### 2. Methodology for Determining Cost & Loadings for the 433 Upgrade Options

In the NODA, EPA also discussed alternative options, "413 to 433 Upgrade Option" and "All to 433 Upgrade Option," and an associated simplified cost and loadings analysis for these upgrade options. EPA provided estimates of compliance costs, pollutant reductions, economic impacts and cost-effectiveness based on this simplified analysis. For today's final rule, EPA revised its upgrade option methodology and performed a more detailed analysis of compliance costs and pollutant reductions, incorporating many of the comments received on the NODA as previously discussed.

#### a. Determining Regulatory Status

EPA reviewed the regulatory status for each survey questionnaire (*i.e.*, to confirm whether a given facility was currently regulated by part 413, part 433, both, or neither). Based on the applicability section of part 413 and 433 (*see* 40 CFR 413.01 and 433.11(c) and (d)), EPA concluded that currently all surveyed facilities included in the database for the proposed Metal Finishing Job Shop and Printed Wiring Board subcategories are regulated by part 413 and/or part 433. EPA first used the date operations began at the facility (as reported in the survey questionnaire) to identify the appropriate regulation. EPA assumed a facility was subject to part 433 if it began operations after 1982 because part 413 only applies to indirect discharging facilities operating before 1982. Next, EPA reviewed effluent discharge data from the remaining facilities to determine if the facility was discharging MP&M process wastewater. Finally, for facilities for which EPA does not have effluent discharge data, EPA called the site or its control authority to determine the regulatory status.