

percent for noncarcinogens or greater than 0.1 percent for carcinogens. The use of this *de minimis* level for HAP reporting was implied because the data used to set the MACT floor was submitted under the same guidelines. Accordingly, language has been included in the final preamble and rule to clarify that coatings with HAP contents below 1 percent for noncarcinogens and 0.1 percent for carcinogens are considered to be zero-HAP materials.

Although affected sources are not required to report detailed HAP content information on these zero-HAP materials, inclusion of these materials could be beneficial to meeting the applicable rolling 12-month emission limit(s). Coatings that contain no HAP usually contain some amount of solid material that will help to lower the organic HAP emission rate for the 12-month compliance period.

Several commenters requested specific exclusions for products or coatings that may have been included in the MACT floor determination but do not fit into the wood building products surface coating source category. Specifically, commenters cited coatings called tempering oils (such as linseed, tall, tung, soy, otaseka, and other drying oils or mixtures of such oils) which would be regulated as part of the proposed plywood and composite wood products NESHAP (68 FR 1275, January 9, 2003). In response to these comments, we excluded drying or tempering oils from the final rule. Please refer to § 68.4681(c)(1) of the final rule which lists processes that will most likely be covered by the proposed plywood and composite wood products NESHAP.

Some commenters referred to specific products that they believed should not be subject to the requirements of the wood building products surface coating source category. These included asphalt-coated fiberboard and cellulosic ceiling tiles. Commenters asserted that neither product is coated with HAP-containing materials and that regulating such products would be burdensome for recordkeeping purposes.

We further evaluated the types of coatings and processes used to make asphalt-coated fiberboard, also called "builders board" or "insulation board," and found that only a few facilities in the United States make these products, with varying manufacturing and coating processes. With regards to the coatings used on fiberboard products, the asphalt material can be included as part of the emulsion used in the fiberboard forming or manufacturing process, or the asphalt (mixed with mineral spirits) can be applied to the fiberboard substrate.

Depending on the company and the process, the coating can be applied before the final dryer or after the final dryer with the product allowed to air dry, usually outdoors on racks.

Ceiling tiles are usually coated using slurries of titanium dioxide and various clays. Although non-HAP wetting agents or defoamers are occasionally added, there are no organic solvents used. These coatings cure by drying and not by chemical reaction and are considered durable only for dry, non-contact indoor exposure.

Because of the small number of facilities coating these products and the fact that most of the coatings associated with these types of products are applied during the substrate forming process (e.g., to the wet mat being formed) or prior to the final substrate drying operation, fiberboard coating operations (including those used in the manufacture of asphalt-coated fiberboard and ceiling tiles) would be covered under the proposed plywood and composite wood products NESHAP. For this reason, these products will not be subject to the final rule for the surface coating of wood building products.

Several commenters requested more research concerning the low-coating usage cutoff, suggesting that the cutoff should be higher. The low-usage cutoff was based on the total annual coating usage of the smallest facility in the MACT floor database. All facilities in the database have annual coating usages above 4,170 liters (1,100 gallons). Available data indicate that the coating application processes and control technologies being considered are appropriate for all sources with at least this level of coatings usage. Considering that the surveyed sources in the database included a cross section of various companies, products, and locations, we do not believe that collecting additional data would raise this cutoff. Therefore, no changes have been made to the low-coating usage cutoff.

While we cannot justify raising the low usage amount or establishing low usage cutoffs for individual subcategories, additional language has been included in the final rule to exempt sources that are not commercial manufacturers of wood building products. The final rule is intended to apply only to commercial manufacturers, which are the types of facilities represented in our database.

Several commenters requested exemptions for sources that laminate paper or vinyl to composite wood products. Although we agree with the commenters that HAP emissions from

wood laminating processes are typically low at the present time, an exclusion is not justified because future coating technologies could increase HAP emissions. To further clarify applicability, laminates applied prior to pressing of the substrate would be covered by the proposed plywood and composite wood products NESHAP, and the laminates applied after pressing of the substrate are covered by the wood building products (surface coating) NESHAP.

Commenters stated that the proposed definition of "wood building product" excludes the majority of the wooden windows and doors manufactured due to the weight characteristic. In response, we have written the definition of "wood building product" to exclude the weight of glass components. A wood building product is now defined as any product that contains more than 50 percent by weight wood or wood fiber, excluding the weight of glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building.

As a result of comments received, the application of the rule to antifungal coatings was evaluated. Because these coatings can be applied during many different stages of production, we have clarified the applicability of the final rule to these coatings. Antifungal coatings will be covered by the wood building products surface coating NESHAP if they are applied after the substrate manufacturing process.

Several commenters requested that the final rule be written such that the HAP limits apply only to HAP that are released to the atmosphere, recognizing that some HAP in the coatings are not emitted (*i.e.*, styrene, dibutylphthalate, ethyleneimines (aziridines), and Bis 2-ethylhexyl phthalate (DEHP)). The data collection activities and subsequent MACT floor determinations were made using the assumption that all volatile organic HAP are emitted, *i.e.*, organic HAP content of the coatings is equivalent to HAP emitted.

We realize that in a few cases, such as the four compounds identified by the commenters, our assumption is not totally accurate because a small fraction of the total HAP may be tied up in the coating. However, we believe that the 12-month rolling average emission limits provide an adequate time frame for such special coatings to be used and averaged in with the other coatings and still meet the emission limits.

Due to these reasons, we do not believe special compliance alternatives are warranted for a few compounds used in some coatings. Affected sources can use alternative test procedures to