

demonstrate a lower HAP emissions value for a particular coating.

B. Overlap With Other NESHAP

Many commenters were concerned about the large potential for the wood building products surface coating source category to overlap with other NESHAP, specifically the promulgated wood furniture manufacturing NESHAP (60 FR 62930, December 7, 1995) and the proposed miscellaneous metal parts and products coating NESHAP (67 FR 52780, August 13, 2002). Two commenters wanted some way to consolidate all coating operations in order to be subject to only one NESHAP. One of these two commenters stated that 97 percent of the coatings used by his company, a window manufacturing facility, are applied to metal (aluminum) windows, and the remaining 3 percent of the coatings are applied to wood components of the windows. The second commenter said that 95 percent of the coatings used by his facility are applied to wood furniture components, and the remaining 5 percent of the coatings are applied to interior panels.

In response to these comments, we have included a provision to the applicability section of the final rule. This new language states that an affected source that could be subject to more than one coating NESHAP, and that has one type of surface coating operation that accounts for at least 95 percent of the total (annual) coating usage at the source, has the option of complying with the requirements of the predominant coating rule (including all applicable emissions limitations, operating limits, and work practice requirements) for all coating operations that would be subject to a NESHAP.

We are allowing the small amount of coating (less than 5 percent of the total usage) to be regulated at the same level(s) as the majority (at least 95 percent) of coating usage to simplify applicability determinations and recordkeeping and reporting for those sources. With this applicability provision, the two sources described above would be allowed to comply with the emission limits for the proposed miscellaneous metal parts NESHAP and the promulgated wood furniture manufacturing NESHAP, respectively, for all of their coating operations.

According to our data, very few sources will be able to take advantage of this predominant activity option. For this reason, we expect any emissions increase that could occur (where the emission limits in the predominant NESHAP are less stringent than the limits in the other applicable NESHAP) to be very small.

C. Subcategories

Several commenters requested additional guidance on the correct classification of moulding and trim. Originally, mouldings were classified according to the final use of the moulding. Commenters stated that the same moulding or trim could go around windows and doors, be used as baseboards, as trim between ceilings and walls, or as chair railing. To eliminate the classification of different types of moulding and trim into different subcategories, we have included all moulding and trim in one subcategory. However, this classification still excludes moulding and trim associated with wood cabinets and other types of wood furniture (which are subject to the promulgated wood furniture manufacturing NESHAP, subpart JJ). This change also involved the renaming of two subcategories. The proposed "windows and doors" subcategory has become the "doors, windows, and miscellaneous" subcategory and will include all moulding, trim, millwork, and miscellaneous products that do not fit in the other subcategories. The proposed "exterior siding, doorskins, and miscellaneous" subcategory has become the "exterior siding and primed doorskins" subcategory. As a result, the MACT floor emission limits were recalculated and are included in the final rule.

Several commenters were concerned with overlap among subcategories. The commenters described scenarios where facilities are coating multiple products, but did not provide data or specifics on any known facilities. Issues related to coating requirements for various products were considered when we developed the five subcategories and served as the basis for many of those decisions. According to our database, there are no facilities that are potentially subject to more than one subcategory emission limit. Because subcategories were created to accommodate unique differences in performance criteria that indicated a need for different HAP contents (based on the information provided by the various industry segments in the database), we believe it is not appropriate to combine operations under separate subcategories. Therefore, we are not allowing a source to choose one emission limit based on the amount of coating used in a predominant subcategory and apply that same limit to another subcategory.

Several commenters requested additional or reorganized subcategories to simplify enforcement. We do not agree with the commenters and believe

the subcategorization scheme adopted for this source category is appropriate and complete. All subcategories were evaluated with respect to product performance requirements, associated coating usage, organic HAP emissions, coating application equipment, and control device applicability. Each subcategory showed technical differences within one or more of these criteria. For additional information, see Docket A-97-52.

Several commenters requested reevaluation of the MACT floors due to the addition of new products such as topcoated doorskins. These products require coatings with a higher level of HAP content or more layers of coatings than products used in the MACT analysis. Although separating these types of topcoated or finished doorskins from the "exterior siding and primed doorskins" subcategory could cause sources that coat doorskins to comply with two separate emission limits, we agree that the additional layers of coatings required for finished doorskins are likely to have higher HAP emissions than primed doorskins. We also agree that finished doorskins have more demanding and stringent performance requirements than primed-only doorskins. In response, we have included finished doorskins in the "doors, windows, and miscellaneous" subcategory where the exterior climate performance requirements associated with all doors and windows have been accounted for with the higher emission limits.

Several commenters also requested subcategories related to color coatings due to the increased use of these coatings since the MACT analysis was begun. Because the commenters offered no explanation for the differences between color and clear coatings, we can only consider the fact that business decisions were made to add color coatings. This alone is not a compelling technical reason to subcategorize differently or to change the MACT floors. The data used to determine subcategories and the applicable MACT floor level of control were the best information available to EPA at the time. Production is updated continuously for various reasons, and changing the MACT floor determination based on constantly changing conditions would not be appropriate.

D. MACT Limits

Several commenters disagreed with the zero HAP emission limits that were established for the NESHAP. Specifically, the commenters felt that the MACT limits should contain at least two significant figures to account for the