

presence of a small amount of HAP in what we have described as non-HAP coatings. To address these concerns and to clarify that the MACT limits are not absolute zero for some new sources, the final rule includes a change in the metric units from kilogram HAP/liter solids to grams HAP/liter solids where the value is rounded to the nearest integer.

Several commenters argued that metric units should not be used to demonstrate compliance. The use of metric units instead of English units is based on Federal government policy (the Metric Conversion Act of 1975 as amended by the Omnibus Trade and Competitiveness Act of 1988). While metric units are included, compliance is not required through metric units because the MACT floor determination used English units. Accordingly, we have included language stating that compliance can be demonstrated using either English or metric units.

E. Test Methods

One commenter noticed that some ASTM test methods have been updated. The listed test methods have been updated and incorporated by reference in the final rule.

Several commenters asked for clarification on using methods specified by the NESHAP for determining certain qualities of the coatings, thinners, and cleaning materials. As a result, we included provisions in the final rule that owners or operators are allowed to submit an alternative technique if the test methods specified in the final rule are insufficient to determine the specified qualities. For mass fraction of organic HAP, the final rule has been written to allow resolution of any discrepancies between the test methods for determining the mass fraction of organic HAP versus formulation data through consultation with the regulatory compliance authority.

Many commenters also expressed confusion regarding the use of Method 24 as an alternative to Method 311. According to the commenters, Method 24 requires that the water content of the coating be determined and subtracted from the total volatile content. This determination contains greater variability than the limit in the final rule for existing and new sources that fall into the "other interior panels" and the "exterior siding and primed doorskins" subcategories and new sources that fall into the "interior panels and tileboard" subcategory. Therefore, the final rule includes the provision that Method 24 will not be used for those coatings with a water content that would result in an effective detection

limit greater than the applicable emission limit.

Two commenters disagreed with the use of a helium gas pycnometer to determine the volume fraction of coating solids (which is required by ASTM D 6993). Section 63.4741(b) of the proposal provided two options for determining the volume fraction of coating solids (nonvolatiles) for each coating: (1) Use of either of the two referenced ASTM methods (D2697–86 (Reapproved 1998) or D6993–97), or (2) use of information from the supplier or manufacturer of the material. In response to the commenters' concerns, a third option has been included in the final rule that allows the amount of coating solids to be calculated using the total volatile matter content of the coating and the average density of the volatile matter in the coating. If these values cannot be determined using one of the specified methods, the owner or operator may submit an alternative technique for determining their values for approval by the Administrator.

Several commenters asked that the final rule clearly specify whether compliance demonstration calculations are to be rounded or truncated to the number of decimal places specified in the emission limit. The commenters recommended that results be truncated to three digits after the decimal.

In response, language has been included in the final rule that specifies that compliance is demonstrated by rounding the rolling 12-month emission rate (to two decimal places for English units and the nearest integer for metric units), and not by rounding the individual numbers used to determine the rolling 12-month rolling emission rate.

F. Cost and Economic Assumptions and Impacts

Due to changes in the MACT floor emission limits for the "other interior panels" subcategory and changes to the number of estimated affected sources in the "exterior siding and primed doorskins" and "doors, windows, and miscellaneous" subcategories, the overall industry cost impacts have changed to \$22.5 million.

G. Compliance Procedures

Several commenters noted a discrepancy between the proposed § 63.4692(b)(ii) and (iii). Section 63.4692(b)(ii) reduces the data to block averages, but § 63.4692(b)(iii) maintains the 3-hour average combustion temperature at or above the limit. We made corresponding changes to Table 3 to Subpart QQQQ to Part 63 to read,

"maintain the 3-hour block average" wherever warranted.

Several commenters disagreed with the omission of control devices other than thermal oxidation. The commenters recommended that provisions for biofilters and other innovative technologies be added to compliance Option 3. Compliance Option 3 does not preclude the use of biofilters or other control technologies. You may submit your request for any innovative control technology to the Administrator for approval. Plans for monitoring and recordkeeping requirements should be submitted along with such proposals.

Based on the type and level of HAP emissions at most wood building product surface coating operations, we do not consider biofilters as a likely control technology to be applied to such emission sources. Therefore, specific operating limits and compliance procedures for biofilters have not been included in the final rule. However, the proposed plywood and composite wood products rule (68 FR 1275, January 9, 2003) does include specific operating limits and compliance procedures for biofilters, and these can be used as examples when submitting your request for an alternative control technology.

H. Control Device Operating Limit Requirements

Several commenters stated that the proposed rule does not specify how to account for equipment start ups, shut downs or malfunctions in the calculation of the 3-hour averages used to determine compliance with operating limits for add-on control devices. The commenters suggested that the rule specify that the operating data collected when the control device is "not receiving emissions" not be included in the 3-hour average calculations. We have included language in the final rule to exclude monitoring data from the 3-hour average calculation that was generated during periods when the control device was not receiving emissions.

Several commenters disagreed with the requirement for periodically adjusting the air-to-fuel ratio for catalytic oxidizers. The commenters stated that adding this requirement to the inspection and maintenance plan has no performance benefit. The purpose of the inspection and maintenance plan is to assure that the catalytic oxidizer operates at the conditions that will achieve or exceed the emission destruction efficiency for the control device demonstrated by the performance test. Based on our review, we concluded that a requirement for