

redline/strike-out version of the proposed rule submitted by the commenters, they removed the specific criteria defining similar units in § 63.9620(f) and the criteria indicating the number of units that must be tested per similar group in § 63.9620(g). In the place of these specific criteria, the commenters inserted a statement that refers to criteria established by the State agency or in the title V permit.

Response: In follow-up discussions with the commenters, EPA asked the commenters to clarify their specific concerns regarding the criteria for the testing of representative units. The commenters indicated that their primary concern was with the criteria in paragraphs (3) and (4) of § 63.9620(f), which require the volumetric flow rates of the emission units to be within plus or minus 10 percent of the representative emission unit, and the actual process throughput rate to be within plus or minus 10 percent of the representative emission unit. The commenters stated that these criteria were so restrictive that they would not be able to group very many units.

The EPA also conducted follow-up discussions with the Minnesota Pollution Control Agency (MPCA) regarding the criteria they use for grouping similar units. The MPCA staff indicated that the primary reason they group emission units is to reduce the number of permitted emission units, although the same groupings are used for testing purposes. The grouping of emission units by MPCA was conducted primarily on the basis of control type, installation date, and, to a certain degree, process type. However, in some cases they do group emission units from different processes. They do not group emission units on the basis of flow rate or process throughput.

Based on these discussions with the commenter and MPCA, EPA has determined that the criteria in § 63.9620(f)(3) and (4) are too restrictive and, therefore, do not achieve EPA's true intent—the reduction of the initial compliance test burden for ore crushing and handling and pellet handling emission units. As a result, EPA has not included the criteria in § 63.9620(f)(3) and (4) as proposed. The criteria in § 63.9620(f)(1) and (2) as proposed have been retained in the final rule. In addition, we have included the following new criteria: The representative unit must have parametric monitoring values that encompass the characteristics of all the emission units within the group.

Comment: Three commenters stated that the simultaneous testing of multiple indurating furnace stacks is costly. Two

of the commenters stated that simultaneous testing is also impractical and possibly not even feasible.

Response: In follow-up discussions with the commenters, they stressed that some furnaces have as many as five stacks. In order to test these stacks simultaneously, they would need to have five source testing teams on site at the same time. The commenters stated that this would be very expensive. The commenters stated that for their current title V permits, they are not required to conduct simultaneous tests of all stacks for a furnace. In our discussions with MPCA, they confirmed that, although they require all plants with permits to test all furnace stacks, they do not require that the plants test all the stacks on a furnace simultaneously. Also, in these discussions, it was noted that the operating conditions are consistent enough that emissions should not vary significantly over a short period of time. Based on these discussions, EPA agrees that the simultaneous testing of indurating furnace stacks would be costly and would provide no additional compliance assurance. Therefore, in order to reduce the source testing burden of the final rule on the industry and to maintain consistency with current testing requirements, EPA has not included the requirement for simultaneous testing in the final rule.

Comment: Two commenters stated that any requirements for sample volume or sample time should be removed from the initial and continuous compliance testing requirements. The commenters stated that the final rule should not include provisions that are different from already established EPA test methods.

Response: In the proposed rule, we specified a minimum sample volume of 60 dscf for EPA Method 5 (40 CFR part 60, Appendix A) tests to ensure that enough PM is collected to provide accurate results. The EPA Method 5 does not contain specifications for sample volume or sample time (*i.e.*, sampling duration). Therefore, it is not uncommon for the EPA to specify a minimum sample volume or sample time corresponding to emission characteristics of an industry for EPA Method 5 tests. For example, the Integrated Iron and Steel NESHAP specifies a minimum sample volume (60 dscf) for EPA Method 5 tests.

Based on historical Method 5 tests from taconite plants, most 1-hour tests sampled about 30 to 50 dscf and obtained a dry catch of 2 to 20 milligrams (mg). The EPA's Emissions Measurement and Assessment Division recommends a dry particulate catch of approximately 20 mg for an accurate

Method 5 test. At the same historical particulate concentrations, a sample volume of 60 dscf or a test of 2 hours in duration will obtain a dry catch of approximately 20 to 30 mg. In the proposed rule, we specified a minimum sample volume of at least 60 dscf for each run of a Method 5 test to ensure that an adequate amount of dry catch is obtained. However, since proposal we have determined that specifying a 2-hour sampling time will provide a greater assurance that an adequate catch is obtained. For example, with a sample volume of 60 dscf, a 20-mg dry catch is obtained for units with emissions of 0.005 gr/dscf or greater. By comparison, given the typical sampling rates of 0.75 to 1 dscf per minute from the historical tests, specifying a 2-hour test provides a 20-mg dry catch for units with emissions as low as 0.003 gr/dscf. In addition, specifying the sampling time is consistent with other recently published rules, such as the Portland Cement NESHAP. Therefore, we have modified the testing requirements in the final rule by removing the requirement for a sample volume of 60 dscf and adding the requirement that the duration of each test run be at least 2 hours.

C. How Did We Revise the Emission Limitations?

Comment: Two commenters stated that the emission limits should be set at two significant figures and not three significant figures. The commenters asserted that using three significant figures implies more precision than exists in reality and establishes limits that are unrealistically stringent and that do not allow for natural variations.

Response: In the proposed rule, we numerically expressed the emission limits for all affected sources, new and existing, to three digits (*e.g.*, 0.011 gr/dscf, 0.025 gr/dscf, and 0.008 gr/dscf). Thus, the proposed emission limits were already expressed as one or two significant figures. However, the intent of the commenters is for the EPA to consider rounding the proposed emission limits to two digits to account for normal variability in the taconite iron ore processing operations, performance of air pollution control equipment, and source testing procedures.

We have reevaluated how natural variations were accounted for in the proposed emission limits for existing sources. The PM emission limits for existing sources in the ore crushing and handling affected source and the finished pellet handling affected source remain at 0.008 gr/dscf. In the final rule, you have the option to determine an