

*Response:* In order to demonstrate continuously that uncontrolled organic HAP emissions from a process have not exceeded 10,000 lb/yr, the proposed rule would require daily calculations of the emissions in the preceding 365 days. It appears that the commenters interpreted this requirement to be much more involved than we intended. We expected that, as part of the initial compliance demonstration, an owner or operator would determine the uncontrolled batch process vent emissions for a standard batch and divide this value into 10,000 to determine the number of batches that could be run in a 365-day period. One way to demonstrate continuous compliance would be to track the number of batches produced each day and show that the running total number of batches for the preceding 365 days does not exceed the number calculated during the initial compliance demonstration. The only potentially complicating twist to this process is that the total has to be adjusted to account for any difference in emissions when a nonstandard batch is operated, but we expect such events to be uncommon.

The final rule retains essentially the same requirement as the proposed rule because daily summations are needed to demonstrate continuous compliance, and we do not consider the demonstration to be unduly burdensome. However, upon consideration of the comments, we have decided to make three changes in § 63.2525(e) in the final rule to clarify our intent and perhaps reduce the burden. First, to address the situation of a batch that is run during more than a single calendar day, we specify that the record that the batch was run should be assigned to the day the batch is completed. Second, we agree that physically calculating the summations does not need to be performed each day, provided the necessary data are collected in an appropriate fashion so that each of the daily calculations can be performed at a later date. The final rule allows the calculations to be performed monthly. Note that each day that exceeds the limit is still a separate deviation. Finally, we edited the language to clarify that alternative records that correlate to the total emissions, such as the number of batches, may be maintained.

*Comment:* Several commenters expressed concerns with the proposed quality assurance/quality control (QA/QC) requirements for continuous parameter monitoring and requested that they be removed from the rule. One commenter indicated that the proposed QA/QC requirements are being

introduced in a piecemeal fashion while they are still evolving, are technically unworkable, impose substantial burdens for no apparent benefit, significantly reduce monitor availability, may have unfavorable environmental impacts, and may create safety concerns. In addition, the commenter indicated that the proposed design and data availability requirements overlap with or conflict with existing language in subpart SS. The commenter noted that we decided not to promulgate similar QA/QC requirements in subpart SS. The commenter indicated that the justification for not adopting the requirements in subpart SS is correct and should be applied for subpart FFFF as well. Other commenters also noted that EPA's Emissions Measurement Center staff and industry are working to develop QA/QC procedures for parametric monitoring, and they recommended relying on requirements in existing rules until those efforts are finalized. One commenter considered the proposed QA/QC requirements for pH probes and flow meters to be particularly impractical and burdensome.

*Response:* As mentioned previously, the monitoring requirements in the final rule are based largely on subpart SS and, thus, the sections of the proposed rule referenced by the commenters (*i.e.*, § 63.2475(c) through (f)) no longer apply. We have deleted these QA/QC requirements for the same reasons we decided not to implement similar proposed QA/QC requirements in subpart SS (67 FR 46260, July 12, 2002). Specifically, we are currently developing performance specifications for CPMS to be followed by owners and operators of all sources subject to standards under 40 CFR part 63, which includes subpart FFFF. Also, subpart SS currently specifies requirements for CPMS, and the requirements of subpart SS are referenced by 40 CFR part 63, subpart FFFF. Even though they may not be as specific as those proposed, we decided it would be premature to promulgate performance specifications for subpart FFFF when the performance specifications that would ultimately be promulgated for all 40 CFR part 63 may be significantly different.

*Comment:* Several commenters objected to the proposed requirement in § 63.2475(g) to install, calibrate, and operate a flow indicator at the inlet or outlet of a control device if the flow to that control device could be intermittent. One commenter recommended that § 63.2475(g) be deleted because the closed-vent system bypass monitoring provisions of subpart SS already indicate whether a control

device is being bypassed. Similarly, the second commenter questioned the need for flow indicators and asserted that if the concern is diversion of the vent to the atmosphere, then this prohibition should be so stated. That commenter was also concerned that, since essentially all batch process vents have intermittent flows, the requirement for flow indicators on vents with intermittent flows translates into the installation of numerous flow indicators with high QA/QC costs. The commenter noted that car seals or monthly inspections are allowed in other rules and requested that the flow indicator requirement be withdrawn, or that we explain how the expense in maintaining such devices translates into an environmental benefit. A third commenter also questioned whether the intent was to detect no flow or to detect when a bypass is occurring. The commenter contended that detecting no flow for batch processes is not useful because the flows are intermittent. If the intent is to detect bypasses to the atmosphere, the commenter requested that the final rule incorporate text from 40 CFR 63.114(d)(1) and (2) to clarify the intent.

Two commenters requested that the final rule allow the following alternatives to the use of flow indicators: indicators of vent gas flow, such as duct positions or fan operation; and the use of on/off interlock type devices that are not subject to calibration. One commenter contended that maintaining records of an interlocked valve limit-switch position should be sufficient when the valve only opens to allow flow when pressure is above a specified level.

*Response:* The commenters are confusing the requirement in § 63.2475(g) of the proposed rule with the requirement in Item 4 of Table 5 of the proposed rule. Table 5 of the proposed rule would require a flow indicator in a bypass line to indicate any diversion of flow from the control device. On the other hand, the proposed requirement in § 63.2475(g) to install, calibrate, and operate a flow indicator at the inlet or outlet of a control device if the flow to that control device could be intermittent is for identifying periods when monitored parameter readings should not be included in the daily or block average. This provision was included because periods of no flow are equivalent to periods of non-operation (*i.e.*, the control device is not actually reducing emissions during these periods and, therefore, should not be used to demonstrate ongoing compliance).

Both provisions have been retained in the final rule. The requirements for