

the appropriate treatment technologies (i.e., listed by PAI in Appendix C or equivalent established in literature) for removing PAIs that are used in production at their facility and could be in their wastewater; (2) and establishes a method for demonstrating that the treatment system is well operated and maintained; and (3) the rationale for choosing the method of demonstration.

Permitting authorities could, after receipt of the NOI or at the time of issuing, reissuing, or modifying the NPDES permit, inspect the PFPR facility to see that the listed practices are being employed, that the treatment system is well operated and maintained and that the necessary paperwork provides sufficient justification for any modifications. EPA solicits comment on this approach to implementation of the pollution prevention alternative.

EPA also requests comment on a second implementation option. Instead of utilizing self-certification, this approach could require facilities to submit the necessary paperwork to the permit writer or pretreatment authority for approval. For this option, EPA is requesting comment on whether the submitted paperwork should support the practices as listed in Appendix B of this notice or be based on the practices listed in Appendix B, but allow flexibility to the permitting authority. More specifically, the permitting authority could add to or replace practices in Appendix B with new or innovative practices that are more effective at reducing the pollutant loading (directly or indirectly) from a specific facility to the environment, based on best professional judgement (BPJ). EPA realizes that requiring submittal of paperwork to and approval from the permitting authority would increase the burden and may cause untimely delays in implementing this option. In addition, EPA believes that it may be difficult for the permitting authority to review a facility specific plan that is not based wholly on the listed practices found in Appendix B of this notice. This approach may provide more flexibility for the industry and the permitting authority; however, it will substantially increase the burden on the permitting authorities.

As in other effluent guidelines and pretreatment standards, the compliance deadline for the PFPR pretreatment standards for existing sources would be three years following promulgation and the date of issue, reissue or modification of the NPDES permit for direct discharging PFPR/Manufacturing facilities. New source standards and limitations (PSNS and NSPS) must be complied with when a facility

commences the discharging of wastewater.

IV. Costing Methodology

This section will briefly describe the revisions that have been made to the costing methodology that was used to estimate compliance costs and the pollutant removals for the proposed rule. These revisions are discussed more thoroughly in the updated version of the Cost and Loadings Report and the Treatability Database Report which can be found in the public docket.

In addition to the changes that are made due to the revisions to the scope that are being considered (as discussed in Section II), there are three areas where changes have been made to the costing methodology. These include revisions to: (1) The treatability database to include activated carbon adsorption (AC) as the treatment technology for certain PAIs where additional treatability information has been identified; (2) the costs for the zero discharge alternative to include costs for off-site incineration of non-reusable wastewaters; and (3) the computer model used to develop costs and pollutant removals for the proposed rule to estimate compliance costs and pollutant removals for the pollution prevention alternative.

In order to adjust the estimated compliance costs and pollutant loadings to account for the exemption of specific PAIs and wastewater sources (see Section II for discussion of exemptions), EPA had to remove the PAIs from the influent database. In addition, EPA had to make adjustments to account for the volume of wastewater previously contributed by the PFPR of these PAIs. In the situation where exempted PAIs are the only PAIs used in a product or on a line, it is not difficult to zero out the associated pollutant removals, treatment cost estimates or the wastewater related to production of the exempted PAIs. However, when exempted PAIs are used in conjunction (in products or on shared lines) with PAIs that are covered by the rule, only the pollutant loading contributed by the exempted PAIs can be excluded; the total wastewater related to the production must still be costed. A more extensive description on the revisions to wastewater volumes due to the exemption of certain PAIs (including PAIs with non-surveyed production) can be found in the updated Cost & Loadings Report. These revisions tend to reduce an individual facility's annualized compliance cost estimates as compared to the proposed rule.

EPA revised the treatability database to assign activated carbon as the

treatment technology for certain PAIs where additional treatability information has been identified. In addition to deciding which treatment technologies were appropriate for these PAIs through literature searches and technology transfers, EPA used the same transfer basis as was used in the proposal to transfer achievable effluent concentrations (i.e., the 90th percentile highest achievable effluent concentration) for these PAIs. This information was added to the treatability database for the PFPR industry. This revision tends to increase annualized compliance cost estimates for some facilities as compared to costs estimated at proposal.

In addition to the overall revisions above, revisions were made specifically to the cost estimates for achieving zero discharge of wastewater for the proposed rule. In the proposed rule, EPA only included costs for contract hauling to off-site incineration of treatment system sludges. Based on comment, EPA has revised the costing methodology for the zero discharge option to reflect additional contract hauling of interior equipment rinsates to off-site incineration, and to account for possible water balance problems. Interior equipment cleaning rinsates from lines where detergents or solvents were used are now costed for contract hauling for off-site incineration rather than treatment and reuse. Based on comment, EPA also increased overall, the percentage of the blowdown (bleed off stream) from the UTS. This revision accounts for the volume of wastewater that cannot be reused due to either a salt buildup or a water balance problem at the facility. The percent for blowdown has been increased from 0.2% in the proposed rule to 5% in this notice.

Note: EPA continued to use a blowdown of 0.2% for estimations for the pollution prevention alternative, because under this alternative facilities can discharge these excess wastewater under the P2 discharge allowance.

A third revision was made which was applied to both the revised zero discharge cost estimates and those estimated for the pollution prevention alternative. For the proposal, EPA costed directly reusable rinsewaters that were stored for longer than 90 days to be treated prior to reuse. This conservative approach was used to address the Resource Conservation and Recovery Act (RCRA) limitation for accumulating hazardous wastes for more than 90 days without a permit or interim status (40 CFR 262.34). Instead, EPA is using a more realistic approach by assuming that since these rinsewaters