affected sources at a single plant site (this is increased to 25 emission points where pollution prevention measures are used to control emission points to be included in an average). It is important to stress that the emission point limit is on a "plant site" basis, where the plant site is defined as all contiguous or adjoining property that is under common control. Therefore, if a plant site contains more than one affected source (i.e., different processes manufacturing more than one elastomer product), the 20 emission points allowed in emissions averages must be shared among the different processes. It should again be noted that the sharing of the number of emission points between affected sources does not mean that emission credits and debits can be shared between affected sources. In addition, the owner or operator must demonstrate that the averaging scheme will not result in greater hazard or risk relative to strict compliance with the standards in the absence of averaging.

The NESHAP for Polymers and Resins IV, which was proposed on March 29, 1995, contains a maximum number of emission points per subcategory (rather than per plant site) that can be included in emissions averaging. It is the EPA's intent, depending on consideration of public comments on both rules, to change Polymers and Resins IV to be like Polymers and Resins I (20–25 emission points per plant site), or at least to make the rules the same or consistent at promulgation.

The owner or operator must identify all the emission points that would be included in an emissions average and estimate their allowable and actual emissions using the reference efficiencies of the reference control technologies for each kind of emission point.

For each Group 1 point, the allowable emissions level is the emissions remaining after application of a reference control technology. As a result, all Group 1 emission points that are not being controlled with the reference control technology or a control measure achieving an equivalent reduction are emitting more than their allowable emissions. These points are generating emission "debits." Emission debits are calculated by subtracting the amount of emissions allowed by the standard for a given emission point from the amount of actual emissions for that point. If a Group 1 emission point is controlled by a device or a pollution prevention measure that does not achieve the control level of the reference control technology, the amount of emission debits will be based on the difference between the actual control

level being achieved and what the reference control would have achieved. Equations for calculating debits are provided in the proposed rule.

The owner or operator must control other emission points to a level more stringent than what is required for that kind of point to generate emission "credits." Emission credits are calculated by subtracting the amount of emissions that actually exist for a given emission point from the amount of emissions that would be allowed under today's proposed rule, and then applying a 10-percent discount factor. If credits are generated through the use of a pollution prevention measure, no discount factor is applied. The discount factor mimics provisions in the HON.

Justification for inclusion of a discount factor and for the level at which it is set were discussed in the Preamble to the final HON rule.¹ Equations for calculating credits are also provided in today's proposed rule. To be in compliance, the owner or operator must be able to show that the source's emission credits were greater than or equal to its emission debits.

Credits may come from: (1) Control of Group 1 emission points using technologies that the EPA has rated as being more effective than the appropriate reference control technology; (2) control of Group 2 emission points; and (3) pollution prevention projects that result in control levels more stringent than what the standard requires for the relevant point or points

À reference control technology cannot be used to generate credits beyond its assigned efficiency. For a new control technology or work practice, either the EPA or the permit authority must determine its control efficiency before it can be used to generate credits.

Today's proposed rule also grants State and local implementing agencies the discretion to preclude sources from using emissions averaging. This is also consistent with the HON provisions.

G. Recordkeeping and Reporting Requirements

Specific recordkeeping and reporting requirements related to each emission source type are included in the applicable sections of the proposed rule. Section 63.491 of the proposed rule provides general reporting, recordkeeping, and testing requirements.

The general reporting, recordkeeping, and testing requirements of this subpart

are very similar to those found in subparts F and G. The proposed rule also incorporates provisions of subpart A of part 63. A table included in the proposed rule designates which sections of subpart A apply to the proposed rule.

The proposed rule requires sources to keep records and submit reports of information necessary to determine applicability and document compliance. The proposed rule requires retention of hourly average values (or batch cycle average values) of monitored parameters for operating days when there is not an excursion. If there is a monitoring parameter excursion, the 15-minute values for the excursion period must be retained. The proposed rule also requires that records of all residual HAP content test results. Records must be kept for 5 years.

Section 63.491 of the proposed rule lists the following types of reports that must be submitted to the Administrator as appropriate: (1) Initial Notification, (2) Application for Approval of Construction or Reconstruction, (3) Implementation Plan (if an operating permit application has not been submitted, (4) Emissions Averaging Plan, (5) Notification of Compliance Status, (6) Periodic Reports, and (7) other reports. The requirements for each of the seven types of reports are summarized below.

In addition, § 63.491 incorporates the reporting requirements of subpart H, which requires owners and operators to submit three types of reports: (1) An Initial Notification; (2) a Notification of Compliance Status; and (3) Periodic Reports.

1. Initial Notification

The Initial Notification is due 120 days after the date of promulgation for existing sources. For new sources, it is due 180 days before commencement of construction or reconstruction, or 45 days after promulgation, whichever is later. Owners or operators can submit one Initial Notification to comply with both the requirements of § 63.491 of the proposed rule and the requirements of subpart H. The notification must list the elastomer processes that are subject to the proposed rule, and which provisions may apply (e.g., storage vessels, continuous front-end process vents, batch front-end process vents, back-end process, wastewater, and/or equipment leak provisions). A detailed identification of emission points is not necessary for the Initial Notification. The notification, however, must include a statement of whether the source expects that it can achieve compliance by the specified compliance date.

¹United States Environmental Protection Agency. 59 FR 19430, Friday, April 22, 1994. National Emission Standards for Hazardous Air Pollutants for Certain Source Categories; Final Rule.