

New EPA air emission standards for PCWP were published in the **Federal Register** on July 30, 2004 [69 FR 45944] and amended on February 16, 2006 [71 FR 8342]

### ***Who is covered by the rule?***

You are covered by this rule if:

- You own or operate a plywood or composite wood products facility, or lumber kiln (see front of the brochure for a list of the covered products),
- Your facility is located at a major source of hazardous air pollutants (HAP), and
- Your facility is not part of the low-risk subcategory.

### ***What parts of my facility are subject to the rule?***

Equipment used to manufacture plywood and composite wood products are part of the source category. These include dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing process. This also includes coating operations, onsite storage and wastewater treatment. However, only certain process units (defined in the rule) are subject to control or work practice requirements, including:

- Control requirements (existing and new sources): softwood veneer dryers, primary and secondary tube dryers, rotary and conveyor strand dryers, green rotary dryers, hardboard ovens, and pressurized refiners.
- Control requirements (new sources only): press pre-dryers, fiberboard mat dryers, and reconstituted wood product board coolers.
- Work practice requirements (existing and new sources): softwood veneer dryers, dry rotary dryers, veneer redryers, hardwood veneer dryers, and Group 1 miscellaneous coating operations.

### ***Who is not covered by the rule?***

You are not covered by this rule if:

- You do not own or operate a plywood and composite wood products facility (see front of the brochure for a list of the covered products).
- Your facility is located at an area source of HAP.
- Your facility is part of the low-risk subcategory.

For more details on whether you are affected, see the final rule, posted on the EPA's technology transfer network Web site (<http://www.epa.gov/ttn/atw/plypart/plywoodpg.html>) or check 40 CFR part 63 subpart DDDD for the codified version (with amendments incorporated).

An anonymous online feedback survey regarding this implementation tool is at: <http://yosemite.epa.gov/oar/plywoodsurvey.nsf/survey1?openform>

### ***So, I am subject to the rule, what do I have to do to comply?***

For each process unit, use one of the following 3 compliance options:

- ✓ Production-based compliance option
- ✓ Add-on control system
- ✓ Emissions averaging (existing sources only)

### ***When do I need to be in compliance with the rule?***

**Existing Sources:** October 1, 2008

**New Sources:** September 28, 2004 if initial startup is before September 28, 2004, and upon start-up if initial startup is after September 28, 2004.

### ***How do I comply with the production-based compliance option?***

You must meet operating requirements and a total HAP (the six most common HAP emitted from the PCWP affected source) limit on uncontrolled emissions. The total HAP limit is expressed as lb/thousands of square feet or oven-dried tons (ODT), before controls. This option can not be combined with any other compliance option.

### ***How do I comply with the add-on control system compliance option?***

You must comply with one of the following for each process unit:

- Reduce emissions of THC, methanol, or formaldehyde by 90 percent,
- Limit THC (as carbon), to 20 ppmvd following control device,
- Limit methanol or formaldehyde to less than or equal to 1 ppmvd (uncontrolled emissions must be greater than or equal to 10 ppmvd to use this option).

### ***How do I comply with the emissions averaging compliance option?***

If you own or operate an existing source, you may choose to comply with the emissions averaging option. If you choose this option, you must identify credit-generating process units (i.e., process units not required to reduce HAP emissions under the rule) to offset emissions from debit-generating process units (i.e., process units required to reduce HAP emissions under the rule). You must then demonstrate that you can reduce total HAP emissions from your credit-generating unit(s) to a level greater than or equal to the reduction of HAP emissions required by the rule.

### ***How do I demonstrate that my facility is part of the low-risk subcategory?***

You must demonstrate that your facility is low-risk by measuring emissions and either using a look-up table or conducting a site-specific risk assessment. Appendix B provides guidance on how to demonstrate that your facility is low-risk.

### ***What are my mandatory notification, recordkeeping, and reporting requirements?***

#### **Initial Notification:**

The initial notification states that your facility is subject to the rule. You must submit this notification no later than January 26, 2005, or within 120 calendar days after initial startup, whichever is later.

#### **Notification of Intent to Conduct a Performance Test (If Applicable):**

If your facility is required to conduct a performance test, you must submit a notification of intent to conduct a performance test at least 60 days prior to the test.

#### **Notification of Compliance Status (NOCS):**

You must submit a NOCS no later than 30 days for a compliance demonstration that does not involve a performance test, or 60 days after completion of a performance test.

#### **Performance Test Report (If Applicable):**

If your facility is required to conduct performance tests, you must submit a performance test report within 60 days after completion of the performance test. The initial performance test is required no later than March 29, 2009 for existing sources. New or reconstructed sources must conduct the initial performance test no later than March 27, 2005, or no later than 180 days after startup, whichever is later.

#### **Startup, Shutdown, Malfunction (SSM) Reports:**

The SSM report must be submitted within 2 days, with a follow-up letter within 7 days, after the event, if there was a SSM during the reporting period that is not consistent with the SSM plan. If actions taken were consistent with the SSM plan, the report must be submitted semiannually.

#### **Semiannual Compliance Reports:**

After the initial compliance period, each affected source must submit semiannual compliance reports. The first compliance report covers the period from your compliance date to either June 30 or December 31, and should be submitted by July 31 or January 31, respectively. Subsequent reports must be submitted semiannually on July 31 or January 31 thereafter.

#### **Records:**

Your facility is required to keep records of reported information and all other information necessary to document compliance with the rule for 5 years.

