

Note: While these questions and answers constitute the best available information at this time, the EPA recommends that you consult your State or local air pollution control agency for any final determinations. State and local agencies may implement provisions that are more stringent than those contained in the NESHAP.

DRAFT
Surface Coating of Wood Building Products NESHAP (subpart QQQQ)
Questions and Answers (Q&A's)

9/30/04

Applicability

- 1. Q: What if most of my product is not a wood building product as defined in the NESHAP (e.g., “stock” panels used for store fixtures and shelving), but a little bit of my product can be used as a wood building product (e.g., “stock” panels that are used as insulation board and interior wall paneling)? How does the NESHAP apply to me?**

A: The wood building products (surface coating) NESHAP will apply to that section of your coating operations involving products that are used as insulation board and interior wall paneling. If the coatings from the “stock” panels used as wood building products total less than 4,170 liters (1,100 gallons) annually, then you are not subject to this NESHAP. However, if the amount is above 4,170 liters (1,100 gallons), then you must comply with the applicable HAP emission limit and monitor and report the amount of coating used on the panels that are surface coated and used as wood building products.
- 2. Q: Does the NESHAP apply to surface coating of molded wood parts?**

A: If the molded wood product is finished or laminated at your facility, contains more than 50 percent by weight wood or wood fibers, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building, then your facility is covered by the wood building products (surface coating) NESHAP.
- 3. Q: My facility produces primed and unprimed 4' x 8' wood panels that are then sold and used for a wide variety of applications. If I do not know the final end-use product(s) of the material I am producing, how do I know which emission limit I have to comply with?**

A: We would suggest that you ask your clients what types of end products are involved and then work with your State or local air pollution control agency to determine which limit(s) apply.
- 4. Q: My specialty sawmill applies a wax sealant to the ends of rough cut green hardwood lumber to prevent splitting. The wax contains an aqueous emulsion of paraffin wax, which has no HAP ingredients. Will this action make the sawmill subject to the wood building products (surface coating) NESHAP?**

A: Since the wax contains no HAP, there may not be any HAP-emitting surface coating activities performed by the sawmill. Therefore, the sawmill is probably not a major source of HAP emissions, and not subject to the wood building products (surface coating) NESHAP. If the sawmill is a major source of HAP emissions and is co-located with a facility that produces plywood or other composite wood products, the Plywood and Composite Wood Products NESHAP will most likely cover the sawmill since the wax is used as a moisture sealant.

5. **Q: Are wood fencing, lattice, and decking covered by the wood building products (surface coating) NESHAP?**
- A:** If these materials (products) contain at least 50% wood fibers and are surface coated at a major source manufacturing facility, they will be covered by this NESHAP. However, the NESHAP requirements do not apply to coating operations involving wood pretreatment chemicals or fire retardant coatings applied in a retort or other pressure vessel. If these are the only surface coating operations involving wood building products, the operations are not covered by this NESHAP.
6. **Q: Are adhesives considered coatings for purposes of this NESHAP?**
- A:** Yes, adhesives are considered coatings for the purposes of this NESHAP if they are used during finishing or lamination of a wood building product. If the adhesives are used during the substrate manufacturing process, they are not covered by this NESHAP.
7. **Q: Are metal or metallized coatings covered under this NESHAP?**
- Yes, metal coatings applied to a wood substrate meet the definition of “coating” in the wood building products (surface coating) NESHAP.
8. **Q: My company produces windows that are composed of wood and aluminum and we paint the entire window. Am I covered by this NESHAP? Do I count all coatings used or only the ones used on the wood parts?**
- A:** If the window is composed of at least 50% wood or wood fibers (by weight), and your company is a major source of HAP emissions, then you are covered by the wood building products (surface coating) NESHAP. Only those coatings applied to the wood portion of the windows are covered by the wood windows and doors subcategory organic HAP emission limit.
9. **Q: Are wood picture frames and mirror frames considered wood building products?**
- A:** No, such products are decorative furnishings and are not considered to be used in the construction of a building (and therefore do not meet the definition of a wood building product in the rule).
10. **Q: Are chalkboards/blackboards/marker boards considered wood building products?**
- A:** No, such products are decorative furnishings and are not considered to be used in the construction of a building (and therefore do not meet the definition of a wood building product in the rule).
11. **Q: My facility is subject to the plywood and composite wood products NESHAP. We also apply coatings (i.e., edge seals, primer, company logos, etc.) to the substrate. Must we also comply with the wood building products (surface coating) NESHAP?**
- A:** The plywood and composite wood products NESHAP would regulate miscellaneous coating operations associated with substrate production, which are applied at the manufacturing site. These include anti-skid coatings, concrete forming oil, edge seals, fire retardant, gluing particleboard panels together/cold pressing/joint resin, overlays, ink printing, lamination, nail lines, company logos or information, primers, scarfer, shelving edge fillers, synthetic patches, trademarks/grade stamps, veneer composing, wood patches, asphalt, foil, finishing, coating, oil tempering, and sizing. Other surface coating operations are covered by the wood building products (surface coating) NESHAP.

Low coating usage

12. Q: Does this rule apply to me if my facility uses less than 4,170 total liters (1,100 total gallons) of coatings on wood building products annually, but more than that on other types of products?

A: No, the low-usage cutoff in the source category definition is meant to reduce the impact on facilities that only coat a very small amount of wood building products as a secondary operation at their facility. Your facility meets the criteria, so the wood building products (surface coating) NESHAP will not apply to your facility.

13. Q: If a facility uses more than 4,170 liters (1,100 gallons) of coatings, can they still subtract 4,170 liters (1,100 gallons) from the emission rate calculations? For example, if a facility uses 75,709 liters (20,000 gallons), can they only use 71,539 liters (18,900 gallons) for their monthly emission rate calculations?

A: No, the low-usage cutoff in the source category definition is meant to reduce the impact on facilities that only coat a very small amount of product as a secondary operation at their facility. Surface coating operations that use more than 4,170 liters (1,100 gallons) of coatings are not considered to be small secondary operations and must include the total amount of the coatings, thinners, and cleaning materials used to be in compliance with the wood building products (surface coating) NESHAP.

General

14. Q: What is my potential to emit if I only paint some of my product(s) some of the time – totally dependent on client requests and requirements?

A: Your potential to emit is the maximum capacity of your source to emit HAP under its physical and operational design.

15. Q: Can I combine recordkeeping and monitoring requirements of multiple NESHAPs that I will be subject to?

A: Yes, as long as the recordkeeping and monitoring requirements are met. Also, you must report separately to each individual NESHAP. We strongly suggest that you contact your State or local air pollution agency to combine/streamline your recordkeeping, reporting, and monitoring requirements with your Title V requirements.

16. Q: Do I have to use all 12 months' coatings data when calculating my emission rate for the compliance period? Can I just use the data from the most recent month?

A: If you use the compliance options involving averaging (emission rate with add-on controls option or emission rate without add-on controls option), you must use the total amount of coating used over the last 12 months to calculate the rolling 12-month organic HAP emission rate to be used in demonstrating compliance with the applicable emission limit for each compliance period (e.g., most recent 12 months).

17. Q: How and why were thinners and cleaning materials (that have no solids) included in the coating limits (lb HAP/gal solids)?

A: Since thinners and cleaning materials can be sources of organic HAP emissions, any amount of organic HAP contained in them must be included in the calculation for the total mass of organic HAP. Only the coatings used will have solids content.

18. **Q: How do I account for trace contaminants in my coatings and solvents?**
- A:** When calculating your organic HAP emission rate, you do not have to include HAPs that are present in the formulations in amounts less than 1 percent by mass (or for OSHA-defined carcinogens, less than 0.1 percent by mass). Given that there is only a trace amount of contaminant in the coating or solvent, the contaminant should not be a significant factor in calculating the emission rate.
19. **Q: My wood panel facility manufactures interior panel substrates and occasionally surface coats some products for our specialty buyers. How do I calculate average coatings data in my 12-month rolling average for a month when no coatings were used? What if I still used some solvents or cleaning materials?**
- A:** If no coatings, thinners, and cleaning materials were used in a month, then the month's mass of organic HAP emissions, used to calculate the rolling 12-month emission rate, would equal zero for that month (and then would be added to the preceding 11 months of coating data). If HAP-containing solvents and cleaning materials were used during the month, but no coatings, then you would still have organic HAP emissions for the month. Use the total amount of organic HAP emissions and the total amount of solids using during the 12-month period to calculate the 12-month organic HAP emission rate using the given equations.
20. **Q: If I am complying everywhere within my wood building products surface coating operation through the use of the compliant material option, and want to test/evaluate some potential coatings that are not compliant, how is such a short-term testing operation treated?**
- A:** This is considered a deviation using the compliant material option and must be reported in the Semiannual Compliance Report.
21. **Q: I calculated my emission rate during the initial compliance period (first 12 months) and my 12-month rolling average emission rate exceeded allowable levels due to several months at the end of the year where the emission rate exceeded the emission limits. When I begin calculating my 12-month rolling average emission rate for the following year, do I have to use data from the previous year in my calculations, or do I get to start again with the first month of data from the new year? If I have to use data from the previous year, am I expected to decrease my monthly emission rate to a level that will ensure the 12-month rolling average emission rate does not exceed allowable emission limits, even if this will disrupt production?**
- A:** The 12-month rolling average emission rate must always use the last (e.g., most recent) 12 months of data, regardless of the compliance status of the facility during the past 12 months. If the 12-month rolling average emission rate exceeds the applicable emission limit, this is considered a deviation. In order to avoid a deviation and to compensate for some months with "high" emission rates, some months will have to have comparably "low" emission rates so that the 12-month rolling average emission rate will meet the emission limit set by the standards.
22. **Q: Should my facility-wide HAP emissions include the HAP emissions from painting my facility (buildings)?**
- A:** The painting done throughout a facility can be considered part of maintenance and therefore is not to be considered as part of the facility-wide emissions. Since facility-wide emissions determine whether or not a facility is a major source of HAP emissions and therefore whether the facility is subject to the NESHAP, maintenance activities will not

influence whether a facility is subject to this NESHAP. Also, because the emissions from the painting activities are considered maintenance activities and these types of activities are excluded from this NESHAP, these emissions are not included in the emission rate calculations used to demonstrate compliance with the applicable HAP emission limit.

23. Q: What if my facility coats different wood building products depending on customer requests?

A: In each semiannual compliance report, list the subcategories and emission limits applicable to your facility. Even if there is no coating usage for some subcategories during the six-month period, you are required to demonstrate compliance with the emission limit for each subcategory. If the product was not coated during part of the six-month period, use zero usage for those time periods and calculate the emission rate accordingly.

Capture systems and add-on control devices

24. Q: What are the requirements for “operating limits” in the NESHAP?

A: The requirements for “operating limits” in the NESHAP depend on the type of capture system and control device used at the facility. The operating limits are determined during the initial performance test performed on the capture system and control device.

25. Q: If my facility uses a capture system and control device, how do we know what parameters to monitor as “operating limits”?

A: According to the rule, the parameters are dependent on the capture system/control device system you use. Table 3 to subpart QQQQ of Part 63 provides detailed information on operating limits for various capture systems and control devices and how you must demonstrate continuous compliance with the operating limits. Operating parameters are verified as part of the initial performance testing.

26. Q: If I do not use any add-on control equipment to comply with the applicable emission limits, what are my “operating limits”?

A: If you do not use any add-on control devices to meet the emission limits, you have no “operating limits”.

27. Q: Is my UV coating line considered a pollution control system?

A: A UV coating line would be considered a pollution prevention technique, like changing to low- or no-HAP coating materials to meet the emission limits. Pollution prevention techniques prevent hazardous emissions from forming while pollution control systems reduce the hazardous emissions that are caused by the process itself.

28. Q: Is a baghouse or dust cyclone used for controlling particulate emissions considered add-on control equipment for purposes of this rule?

A: No, the wood building products (surface coating) NESHAP has organic HAP emission limits. Organic HAP emissions from surface coating operations that might be affected by a baghouse or dust cyclone are very low and were not quantified as part of the final rule.

29. **Q: If I do not use any add-on control equipment to comply with the applicable emission limits, do I have to comply with the work practice standards?**
- A:** No, only sources that use the add-on control equipment must develop a work practice plan as part of their initial compliance demonstration and then comply with work practice standards.
30. **Q: What if I have established operating limits for my capture and control system using representative operating conditions, but then later decide to operate at different operating conditions? Do I have to retest? If so, can I operate at the new operating conditions for a length of time before having to test?**
- A:** If the “down the line” operating conditions are different from the representative operating conditions for which you have previously determined operating limits, you must notify your enforcement agency, conduct additional performance tests, and submit the test information. If you operate at the new operating conditions without determining new operating limits you must report the deviation in the Semiannual Compliance Report.
31. **Q: What happens if, due to unforeseen operating conditions, the capture and control system was not operated according to the start-up, shutdown, or malfunction plan? Is this considered a violation?**
- A:** The answer to this question is currently under review.
32. **Q: If I bypass my capture and control system for a period of time, count the capture and control efficiency for that period as zero, and my monthly average is still below the applicable level, would it still be considered a deviation and have to be reported?**
- A:** The answer to this question is currently under review.
33. **Q: If my continuous parameter monitoring system (CPMS) is not working correctly, is this considered a deviation? Does it have to be reported?**
- A:** If there are any instances of monitoring malfunctions, they must be reported in the semiannual compliance report, along with all pertinent details.
34. **Q: When do I have to decide which compliance option I will use to meet the NESHAP requirements?**
- A:** The Initial Notification is due 120 days after the effective date or 120 days after your startup date, whichever is later. If you plan to use add-on control equipment, performance testing of that equipment must be completed by the compliance date and you must submit a Notification of Intent to Conduct a Performance Test 60 days prior to the test.