

## **EPA's Actions to Review Emissions of Toxic Air Pollutants from Plywood and Composite Wood Products Facilities: Information Collection Request**

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- On October 5, 2017, the U.S. Environmental Protection Agency (EPA) issued an Information Collection Request (ICR) to gather information that will help the agency review the Plywood and Composite Wood Products (PCWP) National Emission Standards for Hazardous Air Pollutants (NESHAP).
- The ICR seeks a broad range of information, including emission inventories, compliance demonstrations, process changes and information about control technologies/practices adopted since the application of maximum achievable control technology (MACT). The ICR reflects numerous changes EPA made based on public comments the agency received on two drafts of the ICR issued in 2016 and 2017.
- EPA has designed the ICR as a one-time information collection.
- Current data for the PCWP and lumber facilities that are included in the PCWP NESHAP affected source have been found to be insufficient to adequately review and evaluate the emission standards for this source category.

### **What the Final ICR Covers**

- The ICR – a spreadsheet questionnaire – seeks information from facilities that are major sources of hazardous air pollutant (HAP) emissions and manufacture plywood and veneer, particleboard, medium density fiberboard, hardboard, fiberboard, oriented strandboard or engineered wood products. The ICR also includes major source facilities that operate lumber-drying kilns which are part of the affected source under the PCWP NESHAP.
- Facilities that are synthetic area sources of HAP emissions are not required to complete the ICR spreadsheet, but are asked to provide emissions information if practices, processes or controls were used to limit emissions from PCWP process units.
- The ICR will provide updated equipment configurations, including process unit, resin and production rate data, as well as up-to-date emissions estimates. This information will allow the EPA to conduct risk modeling, perform the technology review and estimate regulatory impacts.
- EPA carefully considered comments on both drafts of the ICR and has made changes to reduce the burden on industry and improve the information the agency receives. Those changes include:
  - Eliminating the initially proposed second phase of the ICR that would have required stack testing;

- Extending the ICR response time from 90 to 120 days;
  - Reducing the response for synthetic area sources to a 1-page form with supporting documentation instead of requiring the ICR spreadsheet;
  - Refining various ICR questions and clarifying instructions per commenter suggestions;
  - Eliminating requests for material safety data sheets, continuous parameter monitoring data, and continuous opacity monitoring data;
  - Adding provisional emissions calculations based on AP-42 emission factors for optional use by respondents that have no other site-specific or more-representative information on potential HAP emissions; and
  - Making requests for tanks modeling and carbon monoxide continuous emissions monitoring optional.
- The information collection seeks to gather facility-level emissions and equipment configuration information, compliance data, control information and descriptions of technological innovations.

### **Responding to the ICR**

- Recipients are asked to complete the ICR using available information and will have 120 days to respond to the ICR.
- Owners and operators will receive the ICR by registered mail. Owners/operators may download the survey from EPA's website at <https://www.epa.gov/stationary-sources-air-pollution/information-collection-plywood-and-composite-wood-products-industry>.
- Facilities have a choice to submit their non-confidential ICR responses either by uploading their response directly into the EPA's Compliance and Emissions Data Reporting Interface (CEDRI), or by saving their response on electronic media such as a flash drive or compact disk and mailing it to the EPA. Responses containing CBI would be submitted directly to EPA's CBI office using the later method.

### **Background**

- In 2004, the EPA finalized the PCWP rule to reduce emissions of toxic air pollutants from facilities that manufacture plywood and composite wood products. Air toxics emitted during the manufacture of PCWP include methanol, formaldehyde, acrolein, acetaldehyde, phenol and propionaldehyde.
- The ICR process, which is governed by the Paperwork Reduction Act, provides the public two opportunities to review drafts of the ICR and supporting materials. EPA issued two drafts of the ICR: an initial draft, published in the Federal Register September 8, 2016, and a

second draft, published August 17, 2017. The U.S. Office of Management and Budget approved the ICR on October 3, 2017 (OMB Control No. 2060-0718).

- The EPA is conducting this ICR to gather data needed to fulfill our obligation under the Clean Air Act (CAA) which requires the EPA to assess the risk remaining after application of the final air toxics standards. This is known as a residual risk assessment.
- The Clean Air Act also requires the EPA to assess, review and revise air toxics standards as necessary, considering developments in practices, processes and control technologies since the standards were first issued.
- The court-ordered deadline for finalizing this Risk and Technology Review (RTR) is June 30, 2020.

#### **For More Information**

- To view the instructions and survey that owners/operators are required to answer – visit <https://www.epa.gov/stationary-sources-air-pollution/information-collection-plywood-and-composite-wood-products-industry>.