



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

October 5, 2017

Mill Manager

<<ICR\_Fac\_Name>>

<<ICR\_Mail\_Address>>

<<ICR\_MailCity>>, << ICR\_MailState>> << ICR\_MailZip>>

Dear Mill Manager:

The U.S. Environmental Protection Agency (EPA) is collecting information as part of the agency's review of the Plywood and Composite Wood Products (PCWP) National Emission Standards for Hazardous Air Pollutants (NESHAP), an assessment that the Clean Air Act (CAA) requires. As part of this effort, the EPA requires your assistance in providing information related to specific air pollutant emissions. Your responses to this Information Collection Request (ICR) will provide the EPA with comprehensive information about the PCWP source category. The EPA will incorporate this important information as it works toward finishing the PCWP NESHAP review by 2020. The EPA is issuing this ICR pursuant to section 114 of the CAA, which authorizes the agency to collect information necessary for this review.

We request that you complete and return the PCWP ICR by February 9, 2018. The ICR is a survey comprised of two Microsoft® Excel spreadsheets. Please download the spreadsheets and Instructions Document at: <https://epa.gov/stationary-sources-air-pollution/information-collection-plywood-and-composite-wood-products-industry>. For more details about how the PCWP ICR applies to your mill, please consult section A1 of the Instructions Document.

Your facility has been assigned the following identification numbers for purposes of this ICR. You will need this information to complete the survey.

**Federal Registry Service (FRS) ID:** <<ICR\_FRS\_ID>>

**ICR ID:** <<ICR\_ID>>

**Confidential Business Information**

As you complete the survey, if you believe that providing any specific information would reveal a trade secret or compromise confidential business information (CBI), please identify this information clearly as CBI in your response.

Please refer to section C of the Instructions Document for more information. Also, clearly label any flow diagrams or other attachments submitted with your survey response that contain CBI. If only a portion of your response includes trade secrets, do not label your entire response as CBI. Facilities that claim large amounts of information to be CBI and/or trade secret(s), especially if other facilities report similar information without such claims, will likely be contacted by the EPA to validate these claims. Any information determined to be a trade secret will be protected by federal law (18 U.S.C. §1905). Please be aware that any information submitted in response to this request that is not claimed or determined to be confidential may be made available to the public without notifying you further (40 CFR part 2.203, September 1, 1976).

### **Clean Air Act Background**

The CAA directs the EPA to evaluate and, as appropriate, reduce air pollution from the PCWP industry. In 2004, the EPA issued a NESHAP for these sources. The law requires the EPA to review and, if appropriate, revise each NESHAP at least every 8 years, taking into account developments in practices, processes and control technologies. Also, within 8 years of a NESHAP's promulgation, CAA section 112(f)(2) requires the EPA to assess any remaining risk and consider whether more stringent standards are needed to provide an ample margin of safety to protect public health or to prevent an adverse environmental effect.

This ICR is one step in an established public process for collecting foundational information as part of CAA-required reviews. The public and stakeholders will continue to have opportunity to comment on the PCWP NESHAP review in the future, including a formal notice-and-comment period on any proposed action.

If you have questions regarding this ICR, please contact John Bradfield in the EPA's Natural Resources Group at 919-541-3062 or [bradfield.john@epa.gov](mailto:bradfield.john@epa.gov). You may also contact the EPA's PCWP ICR Helpdesk during normal business hours (eastern standard time) at [pcwpicr@epa.gov](mailto:pcwpicr@epa.gov) or 1-866-522-7297.

Thank you for your assistance in this effort. The ICR data will provide comprehensive information about the PCWP source category, which will lead to more effective rulemaking.

Sincerely,



Peter Tsirigotis

Director, Sector Policies and Programs Division  
Office of Air Quality Planning and Standards

cc: << CC\_State Contact Name >>, << CC\_State Division >>, << CC\_State Department >>  
(without enclosures)  
<< Region\_Contact\_First\_Name >> << Region\_Contact\_Last\_Name >>, <<  
Region\_Division >>, << Region\_Department >> (without enclosures)

## Enclosures

- Enclosure 1 contains a summary of the EPA's legal authority to obtain the information requested in this survey. As Enclosure 1 explains, section 114 of the CAA, as amended (42 U.S.C. §7414) provides the EPA with this authority.
- Enclosure 2 clarifies information that the EPA considers to be emission data.
- Enclosure 3 summarizes our and our contractors' policies and procedures for handling trade secrets and CBI. Our contractors or other authorized representatives must follow the requirements in Enclosure 3, which ensure your rights and protect privileged information you submit to us.
- Enclosure 4 identifies the contractor who is assisting us with this survey and designates this contractor as our authorized representative for this purpose. This contractor will help us gather information about your facility, conduct this survey and analyze survey data. As our authorized representative, this contractor has the same rights to obtain information discussed in Enclosure 3, has access to information you provide to us and is required to protect information designated as trade secrets or CBI.