

Plywood and Composite Wood Products (PCWP) Information Collection Request (ICR)

Part I: Background and Applicability for Kiln-Dried Lumber Producers

October, 2017

Introduction

- ▶ Background on the PCWP National Emission Standards for Hazardous Air Pollutants (NESHAP)
 - ▶ Coverage of lumber kilns
 - ▶ NESHAP review
- ▶ Purpose and brief overview of ICR
- ▶ Applicability of the ICR for lumber producers

Background: PCWP NESHAP

- ▶ The plywood and composite wood products (PCWP) national emission standards for hazardous air pollutants (NESHAP) were finalized in 2004 (40 CFR part 63, subpart DDDD).
- ▶ Affects “major sources” of hazardous air pollutants (HAP)
 - ▶ There are 187 HAP compounds.
 - ▶ Example HAP: acetaldehyde, acrolein, methanol, formaldehyde, phenol, propionaldehyde
 - ▶ Major sources emit ≥ 10 tons/year of any one HAP, or ≥ 25 of any combination of HAPs.
 - ▶ Some lumber producers are major sources.
- ▶ Lumber kilns located at any “major source” facility are part of the affected source in the PCWP NESHAP.

Background: Why are Kilns in the PCWP NESHAP?

- ▶ In 2003, EPA proposed inclusion of lumber kilns at any type of major source facility in the PCWP NESHAP.
- ▶ After considering comments, lumber kilns at major sources were included in the 2004 final PCWP NESHAP because:
 - ▶ The design and operation of lumber kilns is essentially the same regardless of whether kilns are located at a PCWP facility, sawmill, or other facility.
 - ▶ Many PCWP producers also operate lumber kilns.
 - ▶ Many producers of kiln-dried lumber are major sources of HAP.

Not including lumber kilns in the PCWP NESHAP would have left major sources open to listing as a major source category under CAA section 112(c) for creation of a separate maximum achievable control technology (MACT) standards under 112(d), and potentially case-by-case MACT provisions under 112(g).
 - ▶ Including lumber kilns in the PCWP NESHAP allowed one MACT determination for lumber kilns nationwide.
- ▶ The 2004 NESHAP concluded MACT for lumber kilns is “no emissions reduction.”

Background: PCWP RTR and Remand

- ▶ 8 years after finalizing NESHAP, the Clean Air Act (CAA) section 112 requires EPA to:
 - ▶ Assess the residual risk remaining after implementation of the NESHAP - 112(f)(2)
 - ▶ Review and revise the emission standards, as necessary, taking into account developments in practices, processes, and control technologies – 112(d)(6)
 - ▶ These two reviews are referred to as the “residual risk and technology review (RTR)”
 - ▶ Court-ordered RTR promulgation deadline: June 30, 2020
- ▶ In 2007, as part of litigation on the PCWP NESHAP, the D.C. Circuit Court remanded “no emission reduction” MACT conclusions to EPA to be replaced with emissions standards developed pursuant to CAA section 112(d)(2)-(3) (numeric limits) or 112(h) (work practices).

Purpose of the PCWP ICR

- ▶ Collect information needed for EPA to develop:
 - ▶ Residual risk modeling inputs: emissions data, emissions release point parameters and latitude/longitude coordinates
 - ▶ An equipment inventory to assess potential impacts of regulatory options considered, including:
 - Facilities impacted
 - Small businesses
 - Economic impacts
 - Environmental impacts
 - Energy impacts

Overview of the ICR

- ▶ One-time information collection approved by the U.S. Office of Management and Budget (OMB control no. 2060-0718).
- ▶ As part of the OMB approval process, the EPA issued two drafts of the ICR for public comment:
 - ▶ Initial draft - September 8, 2016
 - ▶ Second draft – August 17, 2017
- ▶ The EPA considered comments on the drafts and revised the ICR to reduce burden on the industry and improve the information collected.
- ▶ ICR responses are due February 9, 2018
- ▶ A completed response includes:
 - ▶ Submittal of the appropriate form in Appendix 1A or 1B of the ICR instructions document if the ICR does not apply, or
 - ▶ Submittal of the ICR spreadsheet and other relevant materials per the checklist in Appendix 5 of the ICR instructions document.

Why did my lumber facility receive the ICR?

- ▶ The EPA reviewed several sources of information when developing the ICR mailing list, including various EPA data bases and other references.
- ▶ Your facility was retained in the mailing list because at least one of the information sources reviewed led the EPA to believe your facility might be a major source of HAP emissions operating lumber kilns.
- ▶ The EPA attempted to remove non-major source kiln-dried lumber producers from the mailing list, including
 - ▶ True area sources – facilities naturally emitting <10/25 tons/year
 - ▶ Synthetic area sources – facilities emitting <10/25 tons/year because they have taken a production limit or applied technology to reduce HAP emissions to avoid PCWP NESHAP applicability
- ▶ The mailing list was available for public comment with the ICR second notice.
- ▶ Despite efforts to narrow the list, in some cases, we were not readily able to discern ICR applicability.

How do I determine if the ICR applies?

- ▶ If you received the ICR but are uncertain whether it applies, review the applicability criteria in section A1 of the ICR Instructions document.
- ▶ The ICR likely applies if both of the following are true:
 - ▶ Your lumber facility operates lumber drying kilns, and
 - ▶ Your facility is a “major source” of HAP emissions.
- ▶ If you are not sure whether your facility is a major source of HAP emissions, you can:
 - ▶ Review your air permit, or
 - ▶ Check any previously developed HAP emission estimates for your facility.

What if the ICR does not apply?

- ▶ Complete form in Appendix 1A if your facility:
 - ▶ Is a true area source of HAP
 - Provide documentation such as a permit
 - ▶ Does not operate lumber kilns or produce PCWP
 - ▶ Was not operational in 2016, remains non-operational
 - Provide a copy of the operating permit (if it is active) for the EPA to use in modeling allowable HAP emissions.
- ▶ Complete form in Appendix 1B if your facility is a synthetic area source of HAP. You are asked to:
 - ▶ Indicate how the facility became a synthetic area source (via production limit or other means)
 - ▶ Provide documentation of synthetic area source status such as a valid operating permit (and kiln test reports, if applicable)

Completing the ICR for Lumber Facilities

- ▶ Lumber facilities will need to complete the ICR spreadsheet (PCWP_survey.xlsx) *for lumber kilns only*.
 - ▶ 10 data tabs plus the certification tab
- ▶ The following materials are available to guide you through completion of the ICR:
 - ▶ ICR Instructions document
 - See Appendix 5 for checklist of materials to be submitted
 - ▶ Webinar: Part II: Completing the ICR for Kiln-dried Lumber Producers (*Coming Soon!*)

Questions?

- ▶ Help Desk:

- ▶ pcwpicr@epa.gov

- ▶ 866-522-7297 (toll free)

- ▶ Webpage:

The ICR survey, supporting documents, and frequently asked questions (FAQs) are available at: <https://epa.gov/stationary-sources-air-pollution/information-collection-plywood-and-composite-wood-products-industry>