EPA
United States
Environmental Protection
Agency

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

## General Overview

October 2017

# Overview

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# Background: PCWP MACT

- The plywood and composite wood products (PCWP) Maximum Achievable Control Technology (MACT) rule was finalized in 2004. MACT rules are also know as national emission standards for hazardous air pollutants (NESHAP).
- Regulates "major sources" of hazardous air pollutants (HAP)
  - There are 187 HAP compounds.
  - Example HAP in PCWP: acetaldehyde, acrolein, methanol, formaldehyde, phenol, and propionaldehyde
  - Major sources emit ≥10 tons/year of any single HAP, or ≥25 tons/year for the total of all HAPs.
  - Large lumber producers are frequently major HAP sources.
- Lumber kilns located at any "major source" facility are regulated under the PCWP MACT rule.

# Background: PCWP RTR Process, Remand

- 8 years after MACT is final, the Clean Air Act requires EPA to:
  - Assess the residual risk remaining after implementing MACT
  - Review and revise the emission standards, as necessary, taking into account developments in practices, processes, and control technologies
  - 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).

# Background: Remanded Units

- Press predryers (existing)
- Fiberboard mat dryers (existing)
- Board coolers (existing)
- Dry rotary dryers*
- Veneer redryers*
- Softwood plywood presses
- Hardwood plywood presses
- Engineered wood presses
- Hardwood veneer dryers*
- Humidifiers
- Atmospheric refiners
- Formers
- Blenders
- Rotary agricultural fiber dryers
- Agricultural fiber board presses
- Sanders
- Saws
- Fiber washers
- Chippers
- Log vats
- Lumber kilns
- Storage tanks
- Wastewater operations
- Miscellaneous coating operations*
- Stand-alone digesters

*Work practice applies

# Purpose of the PCWP ICR

- Update EPA PCWP Databases
  - Current information dates back to the late 1990's.
- Updated information needed to develop:
  - Residual risk modeling inputs: emissions data, emissions release point parameters, and latitude/longitude coordinates
  - An accurate equipment inventory to assess regulatory impacts
    - Facility, small business, economic, environmental and energy impacts
  - An accurate Technology Review
    - Control example: biofilters
    - Process change example: adhesives

# Overview of the ICR

- One-time information collection approved by the U.S. Office of Management and Budget
- During 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 received, revised the ICR to reduce burden and improve information quality.
- ICR responses are due February 9, 2018.

# Survey Applicability

- The PCWP ICR survey applies to major HAP source facilities
- PCWP Industry Segments:
  - Softwood plywood and/or veneer
  - Hardwood plywood and/or veneer
  - Oriented strandboard (OSB)
  - Particleboard
  - Hardboard
  - Fiberboard
  - Medium density fiberboard (MDF) or related products
  - Engineered wood products such as laminated veneer lumber (LVL), laminated strand lumber (LSL), parallel strand lumber (PSL), wood I-joists, or glue-laminated beams
  - lumber mills with dry kilns

# Survey Applicability (cont.)

- Only Major HAP sources are required to respond to the survey
- Synthetic area sources of HAP emissions are asked to return a one page check box form and a copy of their air permit
- Definitions of “major source” and “synthetic area source” are provided in the Instructions Document (p. 2)

# ICR Facilities and ICR IDs

- Each facility receiving an ICR letter was provided with an ICR ID and an FRS ID and should submit a separate response.
- Special instructions for collocated sites/facilities:
  - If your manufacturing site has collocated facilities producing multiple PCWP products under one title V permit and has been assigned one ICR ID#, you should submit one ICR response containing all the product lines.
  - If each of the PCWP facilities at the manufacturing site operates under its own title V permit and has been assigned its own ICR ID#, you should submit one ICR survey spreadsheet per title V-permitted facility.
- If the ICR IDs provided to your facility do not match these descriptions, contact the EPA's PCWP ICR Helpdesk for assistance.

# Requirements for Non-applicable Facilities

- If the ICR does not apply, the facility is not required to complete the survey.
- Submit Form 1A from the appendix for these facilities:
  - True area sources
  - Mills not producing PCWP products or kiln-dried lumber
  - Mills not operational in 2016
    - Provide a copy of the active operating permit if it has been maintained

# Requirements for Synthetic Area Sources

- Synthetic area sources are not subject to PCWP
- Synthetic sources are asked to submit:
  - Appendix 1B form
  - Their operating permit
  - Stack test report for air emissions testing used to verify synthetic area source status
- Synthetic sources do not have to  submit a survey.

# ICR Response

- For facilities required to submit  a survey, a complete response includes:
  - Completed survey spreadsheet
  - Operating Permit
  - Process Flow Diagram
  - Emission Release Point Map
  - All relevant materials on the checklist in Appendix 5 of the ICR Instructions Document.
- See the last slide provided of this presentation for web address containing the ICR or follow this link .

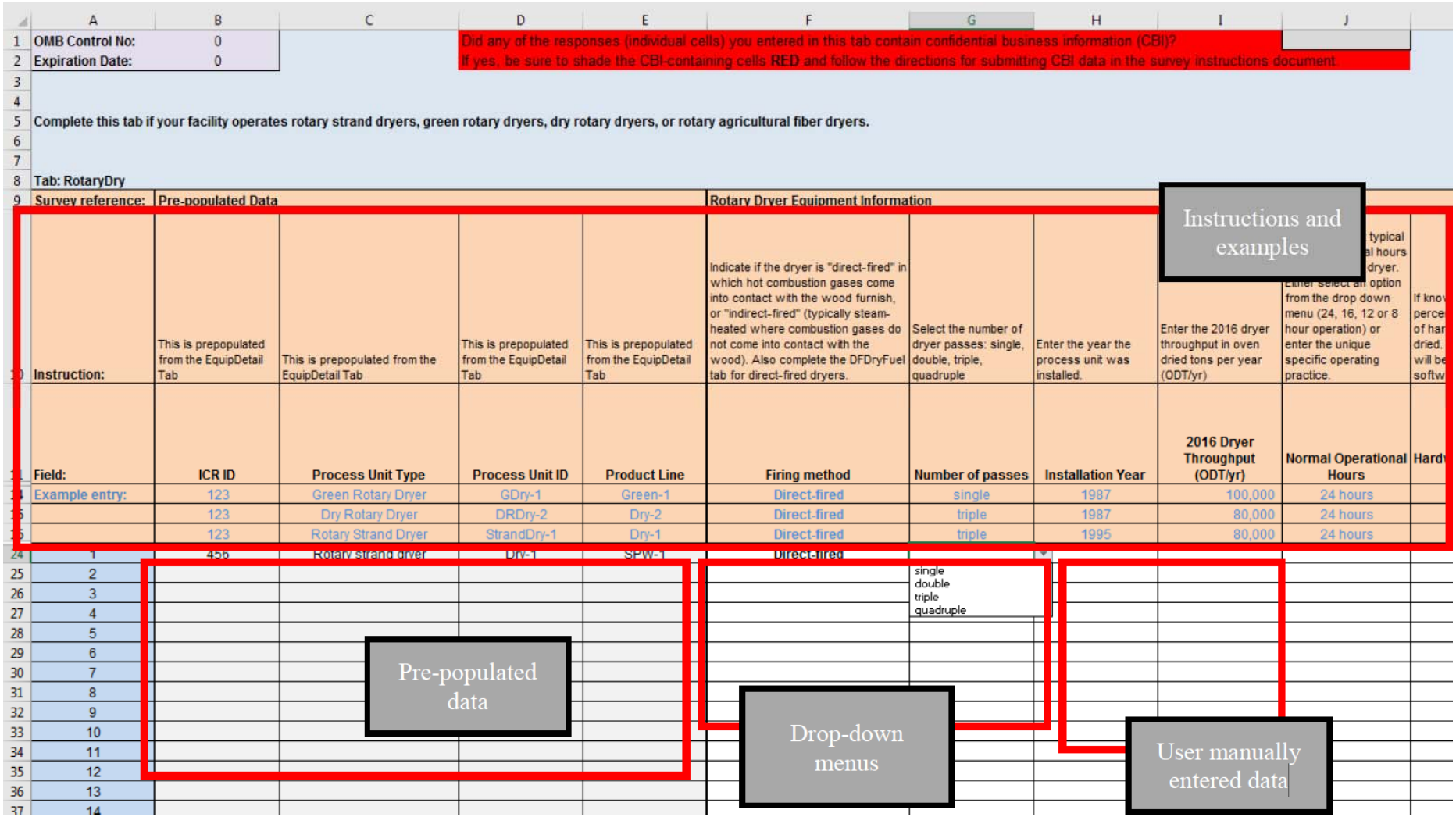
# Other Materials to Submit - if applicable

- PCWP_CEMS.xlsx spreadsheet, if applicable (Section D4c)
- Copy of the Emission Averaging Plan
- OPTIONAL: Copy of TANKS or related emission estimates, if available (Tanks tab)
- Copy of lumber dry kiln schedules (LKiln tab)
- Copies of 2016 semiannual compliance reports (§63.2281(b)/Table 9 of the PCWP NESHAP; SSM and APCD tabs)
- Recommendations for a standard that would apply during startup or shutdown of a process unit or APCD (SSM tab)
- Wastewater effluent limit permits and any case-by-case BPT/BAT analyses (WW tab)
- Wastewater treatment plant (WWTP) flow diagram showing each wastewater handling/treatment unit (WW tab)
- Plan to demonstrate how HAP captured by a wet control device are destroyed, if your facility uses a wet control device as the only means of HAP control (WW tab)
- WWTP emission estimates from measurements, fenceline monitoring, or modeling (WW tab)

# Introduction to the ICR Survey Spreadsheet

- ICR survey spreadsheet consists of 25 tabs
- Table 1 on page 4 of the Instructions Document lists each tab and which facilities are required to complete each tab
- Leave any non-applicable tabs blank
- Many of the instructions needed to complete the tabs are included in the “Instruction” row of each tab
- A complete explanation of the data requested and examples are provided in the Instruction Document

# ICR Survey Spreadsheet Formatting



# ICR Survey Spreadsheet Tab Completion Order

- In general, fill out the ICR survey spreadsheet tabs moving from left to right, beginning with the *Mill* tab.
  - Many tabs will contain prepopulated data from previously completed tabs, to the left.
  - Bold text in the "Instruction" row is used to highlight data that will prepopulate tabs to the right.
- Table 2 on Page 13 of the Instructions Document lists the critical data fields in each tab that must be filled out first to ensure correct prepopulation.
- If you determine that you need to return to a tab to make adjustments, review the subsequent tabs that may be affected by the change and see Table 2 for guidance.

# Table 2. Completion Order for ICR survey spreadsheet

| Complete… | | Before you complete… |
|---|---|---|
| **Tab Name** | **Field Carried Forward to Other Tabs** | **Tab Name** |
| *Mill* | • ICR ID<br>• FRS Site ID | All |
| *Prod* | • Product | *EquipDetail*, *Resin*, *Tank*, *BC*, *EWPPress*, *APCD*, *MiscCoat*, *EmTest* |
| | • Product Line | *EquipDetail*, *Resin*, *Tank*, *VeneerDry*, *RotaryDry*, *TubeDry*, *ConvDry*, *Press*, *EmTest* |
| | • Does this product use a resin? | *Resin* |
| *EquipDetail* | • Process Unit ID | *ReleasePt*, *Permit*, *Tank*, *VeneerDry*, *RotaryDry*, *TubeDry*, *ConvDry*, *FB_HB*, *LKiln*, *DFDryFuel*, *Press*, *BC*, *EWPPress*, *OtherEquip*, *SSM*, *EmTest*, *HAP Emissions* |
| | • Process Unit Type | *ReleasePt*, *Permit*, *VeneerDry*, *RotaryDry*, *TubeDry*, *ConvDry*, *FB_HB*, *DFDryFuel*, *Press*, *OtherEquip*, *APCD*, *SSM*, *EmTest*, *HAP Emissions* |
| | • Process Unit Description | *OtherEquip* |
| | • APCD 1/2/3/4 Type | *APCD* |

# ICR Survey Spreadsheet: Paste Values

- Important Note: If you began working on your response in a different spreadsheet, you MUST paste the data into the ICR Survey Spreadsheet using the "paste as values" function of Excel. Follow these steps PRECISELY:
  - Copy the desired data
  - Select the first cell of the ICR survey spreadsheet into which you plan to paste the data
  - Right click and select "Paste Special"
  - Select "Values"
- Common mistake: trying to copy prepopulated cells
- See page 17 of the Instructions for more information.

# Confidential Business Information (CBI)

- The EPA's procedures for handling CBI are provided in the letter and attachments accompanying the ICR.
- Several things can not be claimed as CBI:
  - 1. General contact information
  - 2. Emission tests and emission data
  - 3. Continuous emissions monitoring data
- Notably, production data accompanying testing and monitoring data may be claimed as CBI.
- If you believe any specific information provided reveals a trade secret, identify this information clearly in your survey response.
  - In the spreadsheet, indicate that a tab contains CBI via the red block at the top of the tab. Then shade cells with CBI info red.
  - In supporting documents, identify the page that contains CBI. Then circle the CBI data and write "CBI" on the page.

# Creating Non-Confidential Version of ICR

- ICR Survey Spreadsheet and PCWP CEMS Spreadsheet:
  - Finish entering all data into the spreadsheet(s). Indicate which data are CBI with red highlighting. This version becomes the CBI version of the spreadsheet.
  - Create a separate non-CBI version of your response by redacting the confidential data in the red shaded cells and entering "CBI" instead.
  - If you used the provisional calculations in the HAP Emissions tab and any production rates or fuel data are CBI, copy/paste (as values) the results of the provisional calculations into the emissions columns before you label the info CBI. Then follow the CBI redaction step above to create your non-CBI version.
- Other supporting documents (see Appendix 5):
  - Create a version of each supporting document with any CBI redacted.
  - If an entire document is CBI (e.g., an entire flow diagram), then submit it only as part of the CBI response

# CBI Response: ICR Survey Spreadsheet

| CV | CW | CX | CY | CZ | DA | DB |
|---|---|---|---|---|---|---|
| Did any of the responses (individual cells) you entered in this tab contain confidential business information (CBI)? | | | | | | Yes |
| If yes, be sure to shade the CBI-containing cells **RED** and follow the directions for submitting CBI data in the survey instructions document. | | | | | | |
| | | | | | | |
| **Control Device and Monitoring System Costs for HAP Controls Installed Within the Past 15 Years** | | | | | | |
| Supply approximate capital costs for the HAP control system. | Enter base year for the HAP control system capital costs (e.g., 2008). | Supply approximate capital costs of the continuous parameter monitoring system (CPMS) equipment for this HAP control device. Include in the equipment costs the analyzer and data acquisition system (DAS), if known. | Enter base year for monitoring system capital costs provided in the previous column (e.g., 2008) | If known, supply approximate annual operation and maintenance (O&M) costs of the HAP emissions control system equipment for this control device. | Describe the types of costs included in the O&M cost estimate in the previous column (e.g., fuel, electricity, parts, materials, labor) | If known, supply approximate annual O&M costs for the CPMS for this control device. |
| **Capital costs of HAP emissions control system ($)** | **Base year for control capital cost** | **Capital costs of parameter monitoring system ($)** | **Base year for CPMS capital cost** | **Annual O&M costs for HAP emissions control system ($/yr)** | **Description of annual O&M costs, including base year** | **Annual O&M costs for CPMS ($/yr)** |
| $ 3,875,000 | 2006 | $ 65,000 | 2006 | $ 425,000 | fuel, electricity, annual media refresh | |
| $ 6,000,000 | 2008 | $ 92,500 | 2008 | $ 120,000 | water, nutrients, labor, electricity | |

# Non-CBI Response: ICR Survey Spreadsheet

| CV | CW | CX | CY | CZ | DA | DB |
|---|---|---|---|---|---|---|
| Did any of the responses (individual cells) you entered in this tab contain confidential business information (CBI)? | | | | | | Yes |
| If yes, be sure to shade the CBI-containing cells **RED** and follow the directions for submitting CBI data in the survey instructions document. | | | | | | |
| | | | | | | |
| **Control Device and Monitoring System Costs for HAP Controls Installed Within the Past 15 Years** | | | | | | |
| Supply approximate capital costs for the HAP control system. | Enter base year for the HAP control system capital costs (e.g., 2008). | Supply approximate capital costs of the continuous parameter monitoring system (CPMS) equipment for this HAP control device. Include in the equipment costs the analyzer and data acquisition system (DAS), if known. | Enter base year for monitoring system capital costs provided in the previous column (e.g., 2008) | If known, supply approximate annual operation and maintenance (O&M) costs of the HAP emissions control system equipment for this control device. | Describe the types of costs included in the O&M cost estimate in the previous column (e.g., fuel, electricity, parts, materials, labor) | If known, supply approximate annual O&M costs for the CPMS for this control device. |
| **Capital costs of HAP emissions control system ($)** | **Base year for control capital cost** | **Capital costs of parameter monitoring system ($)** | **Base year for CPMS capital cost** | **Annual O&M costs for HAP emissions control system ($/yr)** | **Description of annual O&M costs, including base year** | **Annual O&M costs for CPMS ($/yr)** |
| CBI | 2006 | CBI | 2006 | CBI | fuel, electricity, annual media refresh | |
| CBI | 2008 | CBI | 2008 | CBI | water, nutrients, labor, electricity | |

# Submittal Options for Completed ICR Response

- CBI portions of ICR response must be mailed to the EPA CBI office on a CD/DVD/flash drive
  - See page 9, Section C2 of the Instructions Document for the correct mailing address
- Two options for submitting non-CBI ICR response:
  - 1. Upload non-CBI response to CEDRI (preferred)
    - Upload spreadsheet and attachments directly
    - Appendix 6 of the ICR Instructions has more information
  - 2. Mail non-CBI ICR response to EPA Office of Air Quality Planning and Standards on CD/DVD/flash drive
    - See page 7, Section C1 of the Instructions Document for the correct mailing address

# Questions?

- PCWP Help Desk:
  - Email: pcwpicr@epa.gov
  - Phone: 866-522-7297 (toll free)
- Webpage
  - The ICR survey, supporting documents, and frequently asked questions (FAQs) are available at: https://www.epa.gov/stationary-sources-air-pollution/information-collection-plywood-and-composite-wood-products-industry