

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

## General Overview

October 2017

This webinar provides an applicability overview for EPA's Plywood and Composite Wood Products Information Collection Request, or "PCWP" and "ICR," for short. It includes a discussion about applicability – or, who is required to respond to the survey. And, it also includes general information about completing and submitting your ICR response.

The ICR is a survey that was approved by the U.S. Office of Management and Budget, or OMB. OMB approval is required before any ICR can be conducted. It was mailed to facilities in early October 2017.

The intended audience for this presentation is PCWP facilities that received an ICR letter. The goal of this presentation is to provide general information about the ICR and where to look for more detailed instructions.

This presentation is one of several ICR webinars planned by EPA. Two webinars were prepared specifically for Lumber Mills. Additional webinar information on completing several specific tabs in the survey spreadsheet is also planned.

## Overview

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- ▶ Background
  - ▶ PCWP MACT (NESHAP)
  - ▶ PCWP RTR and Remand
- ▶ Purpose of the PCWP ICR
- ▶ Overview of the ICR
- ▶ Survey Applicability
- ▶ ICR Response
  - ▶ Introduction to the ICR Survey Spreadsheet
  - ▶ Confidential Business Information
- ▶ Submittal Options for a Completed ICR Response
- ▶ Questions?

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First, we would like to give you an overview of today's discussion.

We will provide some background on the PCWP MACT, or the "NESHAP," rule. We will also describe the reviews that the Clean Air Act requires for all MACT rules.

The purpose of the ICR will be explained.

An overview of the ICR development process will be provided.

Survey applicability will be explained so that it will be clear exactly who needs to complete the survey and who does not and what everyone's responsibility is.

The materials needed to provide a complete ICR response will be discussed.

We will provide a general introduction to the PCWP ICR Survey Spreadsheet. Again, a separate presentation will walk through a few specific tabs in this spreadsheet.

The special procedures for the treatment of confidential business information will be addressed.

And last, we will review the submittal options for your ICR response and give you information about where to go and who to contact with your questions.

## Background: PCWP MACT

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- ▶ The plywood and composite wood products (PCWP) Maximum Achievable Control Technology (MACT) rule was finalized in 2004. MACT rules are also known 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  $\geq 10$  tons/year of any single HAP, or  $\geq 25$  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.

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The plywood and composite wood products maximum achievable control technology rule, or, PCWP MACT was finalized in 2004. MACT rules are also known as national emission standards for hazardous air pollutants, or NESHAP rules.

MACT is a term defined in the Clean Air Act that specifies how the EPA must set limits or work practice requirements in each standard.

MACT rules regulate major sources of Hazardous Air Pollutants, or HAP. There are 187 HAP compounds identified in the Clean Air Act.

Examples of HAP from PCWP facilities include acetaldehyde, acrolein, methanol, formaldehyde, phenol, and propionaldehyde.

Major HAP sources are defined as any source that emits greater than or equal to 10 tons per year of any individual HAP, or, greater than or equal to 25 tons per year for all HAPs combined.

Large sawmills with lumber kilns are frequently major HAP sources. Lumber kiln HAP include methanol, formaldehyde and acetaldehyde.

Again, EPA has prepared two specific ICR webinars for sawmills with lumber kilns.

## 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).

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Now let's talk about the PCWP rule review and a judicial remand received by the EPA.

Eight years after each MACT is finalized the Clean Air Act requires EPA to conduct a risk and technology review, or RTR. Each RTR includes two core actions.

First, the health risks from the HAP emissions remaining, after MACT is implemented, are evaluated in a risk assessment. Each risk assessment uses air emission modeling to evaluate cancer, non-cancer and acute health risk. The data from the risk assessment helps EPA decide whether the ‘residual’ health risk is acceptable or not. An unacceptable decision on risk will result in a proposal that projects an acceptable assessment.

Second, the technology review assesses changes in practices, processes, and HAP control technologies that have occurred since MACT. Changes identified are evaluated for their potential integration into the standard.

EPA also addresses other policy and legal issues during each RTR proposal, focusing on changes that have occurred since MACT. Changes in monitoring and reporting are examples of policy changes. Changes in the treatment of facility Startup, Shutdown and Malfunction periods, or SSM, are examples of legal changes.

In PCWP an additional requirement regards the judicial remand issued for 25 process units regulated by the rule. In 2007 the D.C. Circuit court determined that these 25 “no emission reduction” MACT floor conclusions were illegal. The PCWP ICR collects the information required to address the judicial remand.

## 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

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This is a list of the 25 process units in PCWP that have been remanded to the EPA for the establishment of emissions standards.

We plan to set either emission limits or work practices for each of these units in order to comply with the judicial remand. Again, the ICR was designed to collect the information needed to set these limits. Note that several of the units have asterisks. These units already have an applicable work practice in the standard.

## Purpose of the PCWP ICR

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- ▶ 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

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The purpose of the PCWP ICR is to update the facility, process unit, technology and emission information in EPA's Databases. The current database is based on information we collected in the late 1990's to develop the current PCWP MACT standard. We are aware of many changes in the industry that are not reflected in this database. There have been facility changes and developments in controls and processes that have not been documented.

Information is needed to develop our residual risk modeling inputs. Updates are needed on current emissions data, release point parameters and release coordinates.

An accurate, updated equipment inventory will allow us to accurately assess the impacts of regulatory options. Facility, small business, economic, environmental and energy Impacts will all be measured.

An update of control equipment and process changes will allow us to conduct an accurate technology review. For instance, we are aware of control technology developments in biofilters and process changes in adhesives that need to be documented. It is quite possible that technology changes will help EPA develop emission standards and work practices for the remanded process units.

## Overview of the ICR

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- ▶ 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.

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This ICR is a one-time collection effort that has been approved by the U.S. Office of Management and Budget, or OMB.

As part of the process to get OMB approval, EPA issued two drafts of the ICR, received public comments on those drafts, and incorporated comment recommendations into the final ICR.

ICR responses are due to EPA by February 9, 2018.



## Survey Applicability

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- ▶ 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

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The ICR applies to facilities that are major sources of HAP and produce PCWP products, including kiln-dried lumber.

The industry segments include softwood plywood and veneer, hardwood plywood and veneer, oriented strandboard or OSB, particleboard, hardboard, fiberboard, medium density fiberboard, or MDF, engineered wood products such as Laminated Veneer Lumber and lumber mills with dry kilns.



## Survey Applicability (cont.)

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- ▶ 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)

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Facilities in the industry that have taken permit conditions to stay out of major source status, ‘synthetic area’ sources, or sometimes called minor sources, are asked to send us a one page form and a copy of their permit. They do not need to complete the survey.

Definitions of “major source” and “synthetic area source” are provided on page 2 of the Instructions Document.

## ICR Facilities and ICR IDs

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- ▶ 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.

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Each facility receiving an ICR letter was provided with an ICR ID and an FRS ID and should submit a separate response.

Co-located facilities should respond in one of two ways:

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 for each 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

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- ▶ 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

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EPA facility lists are not perfect. If your facility received a copy of the ICR letter and it does not apply, the facility is not required to complete the survey spreadsheet.

Please submit Form 1A in the first appendix of the instructions if:

Your facility is a true area source, or

Your facility does not produce PCWP, including kiln dried lumber or

Your facility was not operational in 2016.

If the facility was closed in 2016 but maintains an active operating permit, include a copy of the permit when you submit form 1A.

## Requirements for Synthetic Area Sources

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- ▶ 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.

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Synthetic sources do not have to submit a survey.

Synthetic sources are asked to submit:

Form 1B from Appendix 1,

Their operating permit, and

Stack test reports for air emissions testing if the testing was used to verify synthetic status. This is not common.

## ICR Response

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- ▶ 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](#).

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The ICR letter that facilities received provides a link to the survey information. A link is also included on this slide and the web address is included on the last page of the presentation.

Facilities required to submit a survey will need to submit:

A completed survey spreadsheet,

An electronic, or pdf, copy of their Operating Permit,

A process Flow Diagram for their facility,

An Emission Release Point Map for their facility,

And some facilities have operations requiring additional materials. A checklist of all relevant materials is included in Appendix 5 of the ICR Instructions Document. The next slide contains the checklist.

## Other Materials to Submit - if applicable

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- ▶ 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, fence line monitoring, or modeling (WW tab)

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Again, appendix 5 of the instructions contains a list of the material we are requesting. This is a list of 10 items that may or may not apply to your facility. Mostly, they are copies of facility documents.

## Introduction to the ICR Survey Spreadsheet

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- ▶ 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

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The ICR survey spreadsheet consists of 25 tabs.

Table 1 on page 4 of the Instructions Document lists each tab and shows which facilities are required to complete the tab. The table is broken down by industry segment.

You can Leave any tabs blank that do not apply to your facility.

Many instructions needed to complete each column are included in the “Instruction” row at the top of each tab.

However, a complete explanation of the data being requested, and examples, are provided in the Instruction Document



# ICR Survey Spreadsheet Formatting

ICR Survey Spreadsheet Formatting									
OMB Control No: 0		If any of the responses (individual cells) you entered in this tab contain confidential business information (CBI), you must shade the CBI-containing cells RED and follow the directions for submitting CBI data in the survey instructions document.							
Expiration Date: 0									
Complete this tab if your facility operates rotary strand dryers, green rotary dryers, dry rotary dryers, or rotary agricultural fiber dryers.									
Tab: RotaryDry									
Survey reference: Pre-populated Data					Rotary Dryer Equipment Information				
Instruction:	This is prepopulated from the EquipDetail Tab	This is prepopulated from the EquipDetail Tab	This is prepopulated from the EquipDetail Tab	This is prepopulated from the EquipDetail Tab	Indicate if the dryer is "direct-fired" in which hot combustion gases come into contact with the wood furnish, or "indirect-fired" (typically steam-heated where combustion gases do not come into contact with the wood). Also complete the DFDryFuel tab for direct-fired dryers.	Select the number of dryer passes: single, double, triple, quadruple	Enter the year the process unit was installed.	Enter the 2016 dryer throughput in oven dried tons per year (ODT/yr)	Normal Operational Hours
Field:	ICR ID	Process Unit Type	Process Unit ID	Product Line	Firing method	Number of passes	Installation Year	2016 Dryer Throughput (ODT/yr)	Normal Operational Hours
Example entry:	123	Green Rotary Dryer	GRDy-1	Green-1	Direct-fired	single	1987	100,000	24 hours
	123	Dry Rotary Dryer	DRDy-2	Dry-2	Direct-fired	triple	1987	80,000	24 hours
	123	Rotary Strand Dryer	StrandDry-1	Dry-1	Direct-fired	triple	1995	80,000	24 hours
1	456	Rotary Strand Dryer	LRDy-1	SPW-1	Direct-fired	single			
2						double			
3						triple			
4						quadruple			
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

This slide contains Figure 2 from page 12 of the ICR Instructions Document. It shows the format of the tabs in the ICR survey spreadsheet

The Instructions row and the examples row are shaded peach.

Cells shaded gray, denoted by the red box in the lower left hand corner of the screen shot, are prepopulated automatically from entries made in previous tabs.

The spreadsheet contains drop-down menus for common entries. These are accessed by clicking on the triangle that appears beside the cell when the cell is selected. The red box in the lower center of the screen shows an example of a pull down menu.

Unshaded cells are the only places where you should be entering data. The red box in the lower right corner of the screen shows an example of unshaded boxes. Again, many columns with unshaded boxes have pull down menus.

The Instructions Document provides additional formatting and data entry information.

## 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.

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In general, fill out the ICR survey spreadsheet tabs moving from left to right, beginning with the *Mill* tab.

Once you enter data in the Mill tab and move forward, most tabs will contain prepopulated data from completed tabs. To save effort, prepopulation moves information entered from tabs on the left to tabs on the right.

Bold text in the “Instruction” row is used to highlight data that will prepopulate tabs to the right. Data entered in columns with this bold text will prepopulate other tabs.

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
<i>Mill</i>	<ul style="list-style-type: none"> <li>ICR ID</li> <li>FRS Site ID</li> </ul>	All
<i>Prod</i>	<ul style="list-style-type: none"> <li>Product</li> </ul>	<i>EquipDetail, Resin, Tank, BC, EWPPress, APCD, MiscCoat, EmTest</i>
	<ul style="list-style-type: none"> <li>Product Line</li> </ul>	<i>EquipDetail, Resin, Tank, VeneerDry, RotaryDry, TubeDry, ConvDry, Press, EmTest</i>
	<ul style="list-style-type: none"> <li>Does this product use a resin?</li> </ul>	<i>Resin</i>
<i>EquipDetail</i>	<ul style="list-style-type: none"> <li>Process Unit ID</li> </ul>	<i>ReleasePt, Permit, Tank, VeneerDry, RotaryDry, TubeDry, ConvDry, FB_HB, LKiln, DFDryFuel, Press, BC, EWPPress, OtherEquip, SSM, EmTest, HAP Emissions</i>
	<ul style="list-style-type: none"> <li>Process Unit Type</li> </ul>	<i>ReleasePt, Permit, VeneerDry, RotaryDry, TubeDry, ConvDry, FB_HB, DFDryFuel, Press, OtherEquip, APCD, SSM, EmTest, HAP Emissions</i>
	<ul style="list-style-type: none"> <li>Process Unit Description</li> </ul>	<i>OtherEquip</i>
	<ul style="list-style-type: none"> <li>APCD 1/2/3/4 Test</li> </ul>	<i>APCD</i>

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The general instruction to work through the spreadsheet from left to right does not necessarily mean that you must answer every question on a tab before you can move forward. However, it is a good idea. Importantly, there are certain fields that must be completed to ensure that the data that is entered prepopulates correctly throughout the spreadsheet.

This slide is the top of Table 2, the completion order table for ICR spreadsheet. The complete table is shown on pages 13 and 14 of the Instructions Document.

As you can see, the table lists each tab, the column from that tab that is carried forward to other tabs and the tabs that are prepopulated with information from the column. As an example of how important this is, information from the Mill tab, the first tab, prepopulates every subsequent tab

## 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.

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This is important. Many respondents began working on their ICR response in either a draft version of the spreadsheet or just their own draft. If you want to copy the data to your final response spreadsheet from a different, you **MUST** paste the data into the target ICR Spreadsheet using the “paste as values” function in Excel. Follow these steps **PRECISELY**

Copy the desired data, then

Select the first cell of the ICR survey spreadsheet into which you plan to paste the data. Then

Right click and select “Paste Special”. Then

Select “Values” and paste

A common mistake is attempting to copy prepopulated cells. They have formulas and will return an error message if you try to do this.

Page 17 of the instructions document includes a text box with additional information and tips for copying and pasting between files.

## 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.

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The EPA's procedures for handling confidential business information, or CBI, are provided in the letter and attachments accompanying the ICR.

Several things can not be claimed as CBI:

General contact information,

Emission tests and emission data, and

Continuous emissions monitoring data

Notably, production data accompanying testing and monitoring data may be claimed as CBI.

If you believe any specific information provided in your response reveals a trade secret, identify this information clearly in your survey response. Follow these steps:

In the spreadsheet, indicate that a tab contains CBI using the red block at the top of the tab. Then, shade cells with CBI information, red.

If you have CBI 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

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If you have CBI in your ICR response, you will be submitting two separate responses to the EPA, one with CBI and one without CBI, also referred to as the “non-CBI” response file.

First, finish entering all of your data into the ICR Survey Spreadsheet and, if applicable, the PCWP Continuous Emissions Monitoring System, or CEMS, Spreadsheet.

Then, indicate which data are CBI in each tab with red highlighting. Save the spreadsheet(s). They will become your CBI spreadsheet file submission.

Then, using the CBI file, create a new file which will become the Non-CBI file. Open the file. Everywhere you have highlighted CBI cells (i.e. red), redact the information by entering the letters ‘CBI’ in all of the red highlighted cells. Save the spreadsheet(s). They will become your Non-CBI spreadsheet submission.

If any of the production rates or fuel data at your facility are CBI and you used the provisional calculations in the HAP Emissions tab of the Spreadsheet, pay close attention to the HAP Emissions tab as you create your non-CBI version. You should copy and paste the provisional calculation results as values before redacting any of the CBI to create the non-CBI version.

For any other supporting documents in the Appendix 5 checklist that contain CBI, be sure the non-CBI response includes only versions of the documents with CBI redacted. If the entire document is CBI, then only submit that document 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 <b>RED</b> 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	

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This is Example 1 from page 8 of the Instructions Document. It shows the full CBI version of an ICR survey spreadsheet response example. Note that there are six cells shaded red, indicating that the values in those cells should be considered CBI.



# 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.						
<b>Control Device and Monitoring System Costs for HAP Controls Installed Within the Past 15 Years</b>						
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.
<b>Capital costs of HAP emissions control system (\$)</b>	<b>Base year for control capital cost</b>	<b>Capital costs of parameter monitoring system (\$)</b>	<b>Base year for CPMS capital cost</b>	<b>Annual O&amp;M costs for HAP emissions control system (\$/yr)</b>	<b>Description of annual O&amp;M costs, including base year</b>	<b>Annual O&amp;M costs for CPMS (\$/yr)</b>
CBI	2006	CBI	2006	CBI	fuel, electricity, annual media refresh	
CBI	2008	CBI	2008	CBI	water, nutrients, labor, electricity	

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This is Example 2 from page 8 of the Instructions Document. It shows the non-CBI version of the ICR survey spreadsheet response. Note that the CBI from Example 1 has been redacted and replaced with the text "CBI" in the six red-shaded cells.

## 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

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This slide summarizes the submittal options for CBI and non-CBI. Details are provided in Section C of the instructions document.

All CBI responses must be mailed to EPA's CBI office. Page 9 of the Instructions Document provides the mailing addresses for CBI. There is one address for packages sent using the U.S. Postal Service and a second address for packages sent using commercial package carriers, such as FedEx and UPS.

For non-CBI responses, you have two options. The preferred option is to upload all the files from Appendix 5 to CEDRI, the EPA's Compliance and Emissions Data Reporting Interface, our on-line reporting system. More information about this process is provided in Appendix 6 of the Instructions Document.

The second option is to mail the non-CBI to EPA at the address listed on page 7 of the Instructions Document.

## Questions?

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- ▶ PCWP Help Desk:

- ▶ Email: [pcwpicr@epa.gov](mailto: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>

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We look forward to receiving your ICR response. We know you have questions. Don't hesitate to call us, email us, or visit the webpage we have set up for the PCWP ICR.

Thanks for your effort.