FACT SHEET

Proposed Amendments to Air Toxics Standards for Plywood and Composite Wood Products

ACTION

- On August 22, 2019, the U.S. Environmental Protection Agency (EPA) proposed to amend the 2004 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products (PCWP).
- EPA is proposing minor amendments to enhance the effectiveness of the rule by improving compliance and implementation.
- The source category includes facilities that manufacture PCWP such as veneer, particleboard, medium density fiberboard, hardboard, fiberboard, oriented strandboard and engineered wood products. Lumber mills with dry kilns are also included in the source category.
- The PCWP source category includes 230 facilities: 93 PCWP facilities, 121 lumber mills and 16 facilities that produce both PCWP and lumber.
- Facilities in this source category mainly emit acetaldehyde, acrolein, formaldehyde, methanol, phenol and propionaldehyde.
- Following a residual risk and technology review (RTR) conducted under the Clean Air Act (CAA), with this action EPA is proposing to:
 - Revise requirements for periods of startup, shutdown and malfunction (SSM) to be consistent with recent court decisions;
 - Define "safety-related shutdowns" and formalize a work practice for those events, including site-specific procedures;
 - Require testing every 5 years to improve performance of control technologies other than biofilters (already required to test every 2 years); and
 - o Require electronic reporting of performance test results and semiannual reports.
- EPA will accept comment on the proposed amendments for 45 days after publication in the *Federal Register*.

RESIDUAL RISK ASSESSMENT

- The CAA requires EPA to assess the risk remaining after application of the final air toxics emissions standard. This is known as a residual risk assessment.
- Based on the completed risk assessments, available health information and associated uncertainties, EPA determined risks from the PCWP source category to be acceptable and that the standards provide an ample margin of safety to protect public health.
- The maximum individual cancer risk for inhalation for the PCWP category is 30-in-1 million. The maximum chronic noncancer hazard index is less than 1. The maximum acute hazard quotient is 4.

TECHNOLOGY REVIEW

- The CAA requires EPA to assess, review and revise air toxics standards, as necessary, taking into account developments in practices, processes and control technologies.
- As a result of the technology review of the PCWP standards, EPA did not identify any developments that would further reduce air toxics emissions for process units regulated under the original NESHAP.

BACKGROUND

- The CAA requires EPA to regulate hazardous air pollutants, also known as air toxics, from categories of industrial facilities in two phases.
- The first phase is "technology-based," where EPA develops standards for controlling the
 emissions of air toxics from sources in an industry group or "source category." These
 maximum achievable control technology (MACT) standards are based on emissions
 levels that are already being achieved by the best-controlled and lower-emitting sources
 in an industry.
- Within 8 years of setting the MACT standards, the CAA directs EPA to assess the
 remaining health risks from each source category to determine whether the MACT
 standards protect public health with an ample margin of safety and protect against
 adverse environmental effects. This second phase is a "risk-based" approach called
 residual risk. Here, EPA must determine whether more health-protective standards are
 necessary.
- Also, every 8 years after setting MACT standards, the CAA requires EPA to review and revise the standards, if necessary, to account for improvements in air pollution controls and prevention.

HOW TO COMMENT

- The EPA will accept comment on the proposal for 45 days after publication in the *Federal Register*. Comments, identified by Docket ID No. EPA-HQ-OAR-2016-0243, may be submitted by one of the following methods:
 - Go to https://www.regulations.gov/ and follow the online instructions for submitting comments.
 - Send comments by email to: a-and-r-Docket@epa.gov, Attention Docket ID No. EPA-HQ-OAR-2016-0243.
 - Fax your comments to: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2016-0243.
 - Mail your comments to: EPA Docket Center, Environmental Protection Agency, Mail Code: 28221T, 1200 Pennsylvania Ave., NW, Washington, DC 20460, Attention Docket ID No. EPA-HQ-OAR-2016-0243.
 - Deliver comments in person to: EPA Docket Center, 1301 Constitution Ave., NW, Room 3334, Washington, DC. Note: In person deliveries (including courier

deliveries) are only accepted during the Docket's normal hours of operation. Special arrangements should be made for deliveries of boxed information.

FOR MORE INFORMATION

- Interested parties can download a copy of the proposed rule notice from EPA's website at the following address: https://www.epa.gov/stationary-sources-air-pollution/plywood-and-composite-wood-products-manufacture-national-emission.
- Today's action and other background information are also available either electronically at https://www.regulations.gov, EPA's electronic public docket and comment system, or in hardcopy at the EPA Docket Center's Public Reading Room.
 - The Public Reading Room is located at EPA Headquarters Library, room number 3334 in the EPA WJC West Building, 1301 Constitution Ave., NW, Washington, DC. Hours of operation are 8:30 a.m. to 4:30 p.m. Eastern Standard Time, Monday through Friday, excluding federal holidays.
 - Visitors are required to show photographic identification, pass through a metal detector and sign the EPA visitor log. All visitor materials will be processed through an X-ray machine as well. Visitors will be provided a badge that must be visible at all times.
 - Materials for this proposed action can be accessed using Docket ID No. EPA-HQ-OAR-2016-0243.
- For further technical information about the rule, contact Katie Hanks, EPA's Office of Air Quality Planning and Standards, at (919) 541-2159 or hanks.katie@epa.gov.