EPA
United States
Environmental Protection
Agency

Plywood and Composite Wood Products Residual Risk and Technology Review for Lumber Producers

Update for the
Southeastern Lumber Manufacturers Association

March 2018

Overview

- Background: National Emission Standards for Hazardous Air Pollutants (NESHAP)
  - Lumber Kiln Coverage
  - NESHAP Review
  - Residual Risk and Technology Review (RTR) and Remand
- Information Collection Request (ICR)
  - Purpose
  - Recipients
  - Types of Responses
  - Responses Received
- Next steps
- Additional information

Background: NESHAP

- Plywood and composite wood products (PCWP) national emission standards for hazardous air pollutants NESHAP: Finalized in 2004, (40 CFR part 63, subpart DDDD)
- Affects “major sources” of hazardous air pollutants (HAP)
  - 187 HAP compounds (e.g., 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
- Along with PCWP processes, lumber kilns located at any “major source” facility are part of the affected source covered by the PCWP NESHAP

Background: Lumber Kiln Coverage

- In 2003, EPA proposed inclusion of lumber kilns at any type of major source facility in PCWP NESHAP
- In 2004, lumber kilns at major sources were included in final PCWP NESHAP:
  - Design and operation of lumber kilns is essentially 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
  - Including lumber kilns in final PCWP NESHAP allowed one MACT determination for lumber kilns nationwide

Background: Lumber Kiln Coverage (con't)

- 2004 NESHAP concluded MACT for lumber kilns is "no emissions reduction"
- Only requirement for major sources with lumber kilns was to submit an initial notification

- 40 CFR part 63, subpart DDDD is noted in operating permits for lumber facilities subject to PCWP MACT

Background: RTR and Remand

- 8 years after finalizing NESHAP, Clean Air Act (CAA) section 112 requires EPA to:
  - Assess residual risk remaining after implementation of NESHAP - 112(f)(2)
  - Review and revise emission standards, as necessary, taking into account developments in practices, processes and control technologies – 112(d)(6)
  - Court-ordered RTR promulgation deadline: June 30, 2020

- As part of litigation in 2007, the D.C. Circuit Court remanded "no emission reduction" MACT to EPA to be replaced with emissions standards developed pursuant to 112(d)(2)-(3) (numeric limits) or 112(h) (work practices)

ICR: Purpose

- One-time information collection approved by the U.S. Office of Management and Budget (OMB control no. 2060-0718)
- Information collected for EPA to develop residual risk modeling inputs, including emissions data, emissions release point parameters and latitude/longitude coordinates
- ICR included an equipment inventory to assess potential impacts of regulatory options considered including:
  - Facilities impacted
  - Small businesses
  - Economic impacts
  - Environmental impacts
  - Energy impacts

ICR: Recipients

- Developing ICR mailing list, EPA reviewed several sources of information including various data bases and other references
- To minimize burden, EPA attempted to remove non-major source kiln-dried lumber producers from mailing list:
  - 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
- In August 2017, EPA requested public comment on mailing list (OMB ICR approval process)
- In some cases, not able to discern ICR applicability
- ICR was sent to 205 lumber drying facilities

ICR: Types of Responses

Appendix 1A Form	• Facilities that are true area sources, not operating, or not drying lumber • Documentation such as a permit
Appendix 1B Form	• Synthetic area sources • Indication of how facility became synthetic area source (via production limit or other means) • Documentation of synthetic area source status such as a valid operating permit (and kiln emissions test reports, if any)
Full Response	• Lumber kilns at major sources • ICR spreadsheet • Permit copy, facility emission release point map, kiln schedules, and HAP test data (if any)

ICR: Responses Received

- ICR responses are were due February 9, 2018
- 205 ICRs sent to lumber facilities
- EPA received:
  - Appendix 1A responses: 34
    - True area sources: 20
    - Not operating: 4
    - Not drying lumber: 10
  - Appendix 1B responses (synthetic area sources): 25
  - Full responses: 120
- Follow-ups (in process): 26
  - Confirmed not subject to subpart DDDD: 20
  - Placeholders in data base: 6

Next Steps

- Assemble ICR data into data bases
- Analyses for RTR:
  - Technology review for current standards (PCWP processes)
  - Residual risk modeling
- Final RTR court-ordered by June 30, 2020
  - Propose about 1 year earlier (e.g., June 2019)
- Consider how to address remanded standards for various processes including lumber kilns under CAA sections:
  - 112(d)(2)-(3) (numeric limits), or
  - 112(h) (work practices)

Additional Information

- Site visits to view continuous dry kilns (CDKs)
  - North Carolina, South Carolina, Virginia
- Information on technical feasibility and cost of :
  - Capturing and/or elevating the release of lumber kiln emissions (batch kilns or CDKs)
  - Tightening up lumber kilns to reduce ground-level emissions/leaks (batch kilns)
- Technical feasibility and cost of work practices expected to reduce HAP emissions

Questions?

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