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
Plywood and composite wood products (PCWP) national emission standards for hazardous air pollutants NESHAP: Finalized in 2004, (40 CFR part 63, subpart DDD)

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
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.
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 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 DDDDD: 20
  ▶ Placeholders in database: 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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