



Plywood & Composite Wood Products Re-energized

NCASI West Coast Regional Meeting

September 27, 2016

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Wood Panel MACT/RTR - history

■ Context:

- EPA must review 2004 rule and determine if risks mitigated and control technology unchanged (RTR)
- EPA considering MACT standards for kilns and 30 other sources (saws, sanders, etc.) per 2007 court decision

- Sierra Club filed missed RTR deadline suit – February 2016
- How much time will EPA get from DC District Court?
 - Recent case gave EPA just **two** years to finalize – yikes!
 - Another case with missed deadlines ahead in the queue
 - Complicated source category!!!
 - Decision in 2016 or perhaps 2017

- ❖ EPA survey of Industry
 - ❖ Two part review process
 - ❖ Current draft available for public comment by 11/7
 - ❖ EPA address comments and then OMB review (and comment)
 - ❖ EPA culled recipients from >1000 to about 425 mills
 - ❖ Rely on NCASI/AWC survey on testability
 - ❖ Includes a *potential* pollutant testing plan for mills
 - ❖ AWC will comment on draft survey and test plan with help of NCASI and AECOM

Potential Issues in Survey Comments

- Limit to major sources – winnow list
- Simplify – Pre-populate and dropdown menus helpful
- Clear instructions – webinars and outreach
- Burden estimates – 250 hrs/mill (\$28K); \$12M!
- Clarity on scope of collection
 - why PM and opacity data?
 - If configuration changed, historic test data not relevant
- “Disbenefits” of possible controls – GHGs and NOx
- Massive data effort – need plenty of time to respond

Scope of Proposed Testing

(red – NCASI surveyed):



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- Board Coolers
- Fiberboard Mat Dryers
- Stand-alone digester
- Dry Rotary Particleboard Dryers
- Hardwood Plywood Presses
- Softwood Plywood Presses
- Stand Alone Digesters
- Hardwood Veneer Dryers
- Hardboard Humidifiers
- LSL and LVL/PSL Presses
- Atmospheric Refiners
- Dry forming and blending
- Fiber washer
 - Sanders, saws and chippers
- Softwood veneer dryers
- Rotary stand dryers
- Primary tube dryers
- Secondary tube dryers
- Green rotary dryers
- Press predryers

No Testing Planned:



- Lumber Kilns
- Agriboard Presses
- Veneer Kilns
- Veneer Redryers
- PB Molds and Extruders
- I-Joist Curing Chamber
- Log Chippers
- Log Vats
- Storage Tanks
- Glulam and other EWP Press
- Wastewater Operations
- Wastewater Tanks
- Miscellaneous Coating Operations
- Strand/Flake Blending/Forming
- Wet HB Formers
- Rotary Agricultural Fiber Dryers

Miscellaneous Sources listed in PCWP MACT - Table 1



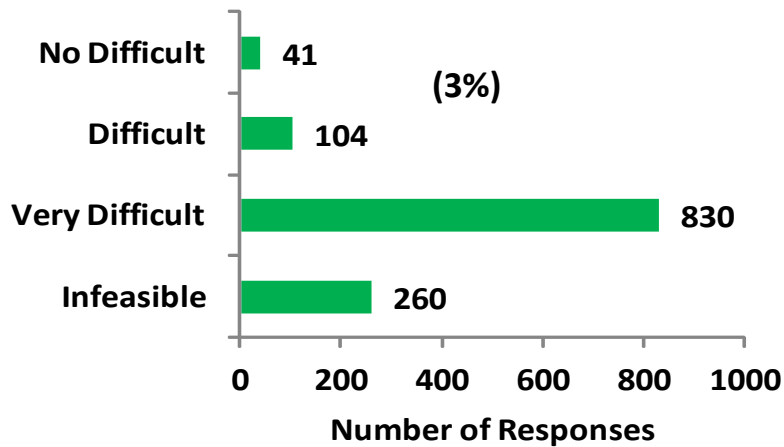
(Red Text Indicates Process Units Included in NCASI Survey)

press predryers	rotary agricultural fiber dryers
fiberboard mat dryers	agricultural fiber board presses
board coolers	sanders
dry rotary dryers	saws
veneer redryers	fiber washers
softwood plywood presses	chippers
hardwood plywood presses	log vats
engineered wood products presses	lumber kilns
	storage tanks
hardwood veneer dryers	wastewater operations
humidifiers	miscellaneous coating operations (including group 1 miscellaneous coating operations)
atmospheric refiners	
formers	stand alone digesters
blenders	

NCASI Summary - Difficulty to Enclose and Test for All Mill and Process Types

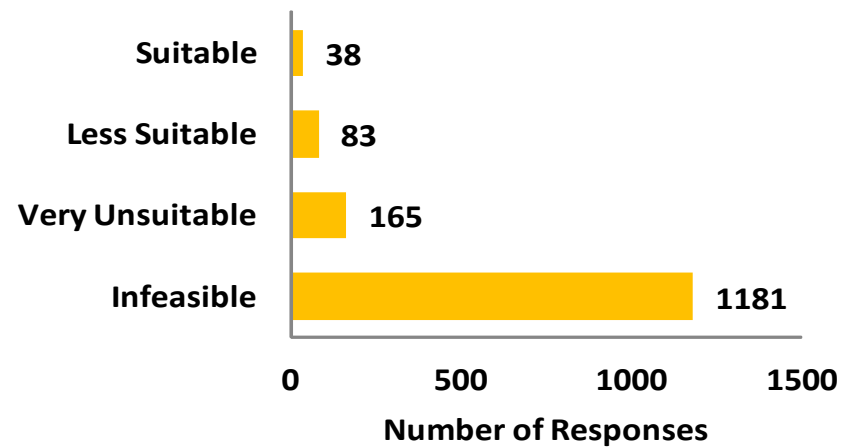
Source Isolation Considered

Difficult of Enclosure



- 97% of the responses indicated that it would be difficult, very difficult, or infeasible to enclose the source

Test Suitability



- 97% of the responses indicated that the sources were less suitable, very unsuitable, or infeasible for emissions testing

Emission Testing Issues



- Several emission sources hard to test and capture emissions; work practice candidates
- Which pollutants to test – why methane?
- Cost of testing - \$7.8M estimated (paid by mills)
 - Cost and feasibility of temporary enclosures
- Cross-contamination between sources – building air
- Number of tested sources – 2 to 5 mills
 - too many, not enough? Capture variability of operations?
 - Suggest better mills if random selection insufficient?
 - Number of runs per test - 7

Summary



- Work closely with EPA
- Data driven analysis critical to achievable and affordable rule
- Work practices should be a central part of the rulemaking process
- Wait for survey results before starting testing (scale back?)
- If the process gets rushed, who knows the consequences... just the RTR obligations?