Plywood & Composite Wood Products
Re-energized

NCASI West Coast Regional Meeting
September 27, 2016
Tim Hunt
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
PCWP - litigation

- 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
Wood RTR/MACT

- 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

(\textcolor{red}{\textit{red – NCASI surveyed}}):

- 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)

<table>
<thead>
<tr>
<th>press predryers</th>
<th>rotary agricultural fiber dryers</th>
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</thead>
<tbody>
<tr>
<td>fiberboard mat dryers</td>
<td>agricultural fiber board presses</td>
</tr>
<tr>
<td>board coolers</td>
<td>sanders</td>
</tr>
<tr>
<td>dry rotary dryers</td>
<td>saws</td>
</tr>
<tr>
<td>veneer redryers</td>
<td>fiber washers</td>
</tr>
<tr>
<td>softwood plywood presses</td>
<td>chippers</td>
</tr>
<tr>
<td>hardwood plywood presses</td>
<td>log vats</td>
</tr>
<tr>
<td>engineered wood products presses</td>
<td>lumber kilns</td>
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<tr>
<td></td>
<td>storage tanks</td>
</tr>
<tr>
<td>hardwood veneer dryers</td>
<td>wastewater operations</td>
</tr>
<tr>
<td>humidifiers</td>
<td>miscellaneous coating operations (including group 1 miscellaneous coating operations)</td>
</tr>
<tr>
<td>atmospheric refiners</td>
<td></td>
</tr>
<tr>
<td>formers</td>
<td>stand alone digesters</td>
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<tr>
<td>blenders</td>
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</tbody>
</table>
97% of the responses indicated that it would be difficult, very difficult, or infeasible to enclose the source.

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?