

Update on the Plywood (PCWP) Risk and Technology Review Information Collection Request (ICR)

NCASI West Coast Meeting
September 27, 2016

Overview

- ▶ Background
- ▶ Comments
- ▶ ICR
 - ▶ Purpose
- ▶ Testing
- ▶ Next Steps

Background

- ▶ Clean Air Act MACT Review Requirements –
 - ▶ §112 (d)/(f)
- ▶ 2007 PCWP Court Remand – ‘Brick’ Units
- ▶ 2016 Deadline Lawsuit

ICR

- ▶ ICR divided into two phases:
 - ▶ Phase 1: Survey (see docket)
 - Controlled Unit Info, Compliance Tests
 - Remanded Unit Info
 - Emissions
 - ▶ Phase 2: Conditional Testing
 - Remanded Unit focus
 - PM for Direct Fired Dryers

Testing

- ▶ Testing, phase 2, is Contingent on Survey Data
- ▶ Test where Survey Data is insufficient to set standard, resolve 'Brick' Issues
- ▶ Metric for Sufficiency
- ▶ Work Practice Requirements under CAA §112 (h)

ICR Purpose

Currently, our information is limited. We have:

- ▶ insufficient emission and test data
- ▶ insufficient Process Info, Remanded Units
- ▶ insufficient Control Technology Info
- ▶ complex, Large Category – OMB Review needed

Comment Request Topics

- ▶ General ICR Comment Requests:
 - ▶ Evaluate Practical Utility
 - ▶ Evaluate the Burden Estimate
 - ▶ Suggestions to Enhance Utility, Clarity, Quality
 - ▶ Suggestions to Reduce, Minimize Burden
- ▶ Emission Estimation Tool Usefulness
- ▶ On-line Electronic Submission Alternative

Electronic Submission Option Via CEDRI

- ▶ Download and upload spreadsheet on-line
 - ▶ Option to prepopulate facility attributes (e.g., units, processes, and released points and parameters) based on latest data available to EPA
 - 2014 National Emissions Inventory (NEI)
 - ▶ Real-time quality control of facility attributes, fewer follow-up questions from EPA
- ▶ Potential advantages
 - ▶ Burden Reduction: Facility data available for all EPA reporting programs, electronically (examples: NEI, TRI, CEDRI, future ICR).
 - ▶ Quality Improvement: Ready availability of data for use, review, revision and amendment by facilities.
 - ▶ Improved Accuracy: Future NEI and National Air Toxics Assessment (NATA)
- ▶ Industry input regarding implementation is being sought

Next steps

- ▶ ICR Comment Process Summary
- ▶ With survey data we will.....
 - ▶ Evaluate residual risk in the category
 - ▶ Evaluate technology changes in practices, processes and controls that impact HAP emissions in the category
 - ▶ Assess the need to collect test data to set MACT standards for Remanded PCWP process units.
- ▶ Survey Data and any Testing data collected will allow us to set MACT standards for Remanded PCWP process units.
- ▶ Timeframes are contingent on petition responses by the U.S. District Court.

Remanded Units – 2007 Court Ruling

- ▶ Press pre-dryers
- ▶ Fiberboard mat dryers
- ▶ Board coolers
- ▶ Dry rotary dryers
- ▶ Veneer re-dryers
- ▶ Softwood plywood presses
- ▶ Hardwood plywood presses
- ▶ Hardwood veneer dryers
- ▶ Humidifiers
- ▶ Atmospheric refiners
- ▶ Formers
- ▶ Blenders
- ▶ Engineered wood products presses
- ▶ Rotary agricultural fiber dryers
- ▶ Agricultural fiber board presses
- ▶ Sanders
- ▶ Saws
- ▶ Fiber washers
- ▶ Chippers
- ▶ Log vats
- ▶ Lumber kilns
- ▶ Storage tanks
- ▶ Wastewater operations
- ▶ Miscellaneous coating operations
- ▶ Stand-alone digesters

Questions?

- ▶ Docket:
 - ▶ Go to: <https://www.regulations.gov/>
 - ▶ Search: EPA-HQ-OAR-2016-0243
- ▶ FR Notice:
 - ▶ <https://www.gpo.gov/fdsys/pkg/FR-2016-09-08/pdf/2016-21507.pdf>
 - ▶ 81 FR 62125
- ▶ PCWP Web Site:
 - ▶ <https://www.epa.gov/stationary-sources-air-pollution/plywood-and-composite-wood-products-manufacture-national-emission>
- ▶ CAER Participation. Email: CAER@epa.gov.
- ▶ Comments Due: November 7th

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