



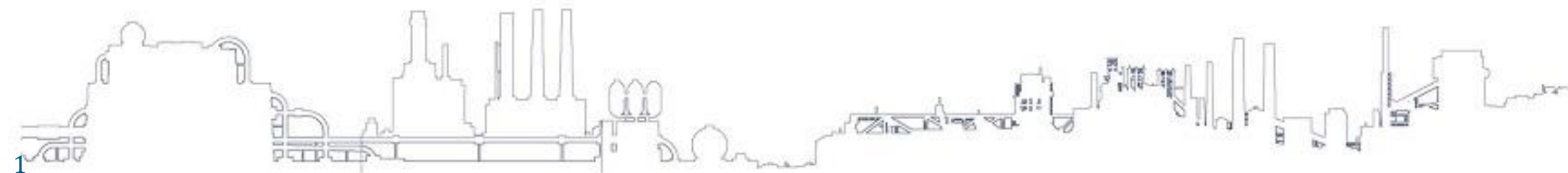
AMERICAN WOOD COUNCIL



Wood Products MACT Updates

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Agenda

- What will we cover today?
 - Background on Plywood and Composite Wood Products (PCWP) MACT
 - Why the RTR?
 - Outcome of EPA's review of the PCWP MACT rule
 - Rule updates that were finalized
 - Changes from proposal
 - What actions are needed to comply
 - Other changes to PCWP MACT on the horizon

Housekeeping

- ❑ How to ask questions?
 - Please enter your questions in the *Questions* box.
 - Q&A at the end.
- ❑ Can I get a certificate of completion?
 - Yes, webinar attendees will receive a certificate upon request.
 - Continuing Education for Certifications/Licenses.
- ❑ Will I get a copy of the slides?
 - Yes we will post a recording of the webinar and a copy of the slides on our website. A link will be emailed to participants.

PCWP MACT AND RTR OVERVIEW



40 CFR PART 63, SUBPART DDDD

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Background on PCWP RTR

- ❑ Expertise – members, NCASI, legal and technical experts
- ❑ Coalition effort – SLMA, CPA, TWC, WWPA; unified strategy/ comments
- ❑ Clean Air Act has three provisions for air toxics – HAPs
- ❑ 2004 PCWP **MACT** rule
 - 90% HAP reductions for 6 HAPs from presses and dryers
 - Lumber kilns and other equipment within “scope” but no limits
- ❑ 2008 court ruling – remanded “miscellaneous sources” to set MACT
- ❑ Post-MACT “**Residual Risks**” – cancer, chronic, & ecological impacts (one time) and ample margin of safety (AMOS) analysis
- ❑ Every 8 years “**Technology Review**” – cost-effective control technology improvements?



PCWP MACT Rule Basics

- ❑ Finalized in 2004, amended 2006 and 2007
- ❑ Covers PCWP facilities that are **major sources** of HAP
 - Plywood, veneer, hardboard, OSB, particleboard, MDF, LSL, LVL, etc.
 - Major source = 10 tpy any one HAP or 25 tpy any combination of HAP
- ❑ Established Maximum Achievable Control Technology (MACT)
 - Certain process units to meet emissions standards or work practices
 - Some process units currently have no requirements other than initial notification
 - Some differences between requirements for existing and “new” sources (those constructed/reconstructed after 1/9/03).



Results of the PCWP RTR

□ EPA modeled 233 major source facilities and determined:

- Residual risk is **acceptable** for the PCWP source category – 2004 MACT standards successful

- Presumptive limit for Maximum Individual Risk (MIR) is 100-in-1 million: modeled results were much lower
- Most of PCWP source category is <10-in-1 million

PCWP Source Category Risk Range for MIR (in 1 million) for 233 sources			
<1 MIR	1≤MIR<10	10≤MIR<20	20≤MIR<30
63	156	13	1
27%	67%	5.5%	0.5%

- Current standards provide an **ample margin of safety**.

- EPA determined **no changes** were necessary as a result of the technology review

- no new “developments” were identified for units subject to standards.



Final Rule Revisions - SSM

- ❑ EPA **removed the SSM exemption** and requirement to have an SSM plan. Added a general duty clause and **Table 3 work practices** that apply during safety-related shutdowns, SS of pressurized refineries, and relights of gas burners in softwood veneer dryers.
- ❑ Facilities must have a record of work practice procedures, must record and report when WP are used, with more detail required if a WP is used more than 100 hours/reporting period (each).
- ❑ Instances where the WP are followed are not deviations or violations of the otherwise applicable compliance options, operating requirements, or work practice requirements (as long as minimum times are met).



Startup and Shutdown

- ❑ A safety-related shutdown is an unscheduled shutdown of a process unit subject to add-on control requirement, during which time emissions cannot be safely routed to control system. Follow documented procedures, stop flow, remove material quickly.
- ❑ Pressurized refiner SS: Route exhaust to controls no later than 15 minutes after startup. Shutdown refiner no more than 15 minutes after gases stop being routed to controls.
- ❑ Direct-fired SW veneer dryer gas burner relights: Cease feeding green veneer, minimize amount of time dryer is vented to atmosphere when relighting burners.

Final Rule Revisions – Testing and Reporting

- ❑ Added 5-year repeat performance testing requirement for control devices (except biofilters still test every 2 years). Not required for capture efficiency if no changes to enclosure.
- ❑ Annual RCO catalyst check not required in year of performance test.
- ❑ Added a variability margin to biofilter temperature range.
- ❑ Changes to excess emissions reporting requirements, including a requirement to estimate quantity of excess emissions for failure to meet an applicable standard.

Other Final Rule Revisions

- ❑ Revised definition of non-HAP coating with updated OSHA reference.
- ❑ Revised requirements for thermocouples to remove the requirement for calibration and instead allow several options for sensor validation checks.
- ❑ Clarification that General Provisions requirements for CMS performance evaluations only apply to CEMS.

Changes from Proposal

- ❑ Did not finalize proposed Appendix B list of carcinogens.
- ❑ Changes to SS work practice wording.
- ❑ Addition of softwood veneer dryer burner relight work practice.
- ❑ Added recordkeeping and reporting requirements around use of work practices, including 100-hour trigger for more detailed report.
- ❑ Flexibility on annual catalyst checks.
- ❑ Small change to biofilter temperature variability margin.
- ❑ More time to comply. The compliance date is 1 year (not 180 days) from publication of the rule in the Federal Register.



THE PATH FORWARD

What to do to comply?

What other changes are down the road?



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Important Dates / Compliance Calendar

- ❑ Clock starts when RTR is published in the FR – **Effective date**
- ❑ New sources (commenced construction or reconstruction after September 6, 2019) to be in compliance on effective date or startup, whichever is later
- ❑ Existing sources – 1 year from effective date
 - SSM remains in-place till then
 - First of the 5-yr repeat performance tests ***within 3 years of effective date*** or ***60 months after previous PT***, whichever is later
- ❑ Electronic reporting of test results and compliance reports (CEDRI).
Use CEDRI template after it has been available for 1 year.



Actions Needed for RTR Compliance

- ❑ Read the preamble and final rule carefully.
- ❑ Determine what is needed to address new work practices – procedures, documentation, programming, recordkeeping, reporting, training.
- ❑ Algorithms or procedures to estimate excess emissions.
- ❑ Review biofilter temperature operating range.
- ❑ Adjust/document temperature sensor validation procedures.
- ❑ Determine when the next performance test is required.
- ❑ Review CEDRI template.
- ❑ Update your compliance calendar.



Repeat Testing Considerations

- ❑ Evaluate whether repeat capture efficiency determination is required for “*wood products enclosures*” (§63.2292)
- ❑ For RCOs: either a catalyst test or performance test must be conducted each calendar year
- ❑ Notification of compliance status (NOCS) required with repeat test
- ❑ Electronic reporting of results now required
- ❑ Test under “*representative operating conditions*” (§63.2292)
 - “Representative” excludes periods of startup and shutdown; may not test during malfunctions
 - Required to describe in test report; only need record on hand for supporting process data

More Changes are Coming

- ❑ Now that the RTR is done, what's next?
- ❑ EPA must address remanded sources from 2008 – kilns, board coolers, saws, sanders, etc.
- ❑ Recent court decision (“LEAN”) – address “unregulated HAPs,” how and when will EPA interpret?
- ❑ Associations engaged EPA when RTR and MACT Remand were linked – “work practices” suggested for all sources
 - ❑ Kilns – temperature and moisture
 - ❑ Resinated materials – meet CARB/TSCA standards
- ❑ Timing: 2021 or later given many other court ordered deadlines
- ❑ Coalition effort





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Questions?

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