

FACT SHEET

Proposed Amendments to Air Toxics Standards for Plywood and Composite Wood Products

ACTION

- On May 5, 2023, the U.S. Environmental Protection Agency (EPA) proposed amendments to the 2020 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products (PCWP).
- The proposed amendments respond to a 2007 partial remand and vacatur of portions of the 2004 PCWP NESHAP and a petition for reconsideration EPA received following the 2020 PCWP NESHAP technology review noting EPA's obligation to address unregulated hazardous air pollutants (HAPs).
- In this action, EPA proposes maximum achievable control technology (MACT) standards for:
 - Acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde from fiberboard mat dryers at existing sources, hardboard press predryers at existing sources; and atmospheric refiners at new and existing sources;
 - Methylene diphenyl diisocyanate (MDI) from tube dryers, reconstituted wood products presses, and miscellaneous coating operations at new and existing sources; and
 - Non-mercury metals, mercury (Hg), hydrogen chloride (HCl), dioxin/furan (D/F), and polycyclic aromatic hydrocarbons (PAH) from direct wood-fired dryers.
- EPA is also proposing annual burner-tune up standards for all direct-fired PCWP dryers, direct-fired lumber kilns, and associated combustion unit bypass stacks.
- In addition, EPA is proposing work practices for various resinated material handling process units, lumber kilns, log vats, stand-alone digesters, fiber washers, and wastewater operations.
- In this action, EPA also proposes to:
 - Remove the emissions averaging compliance option;
 - Require monitoring of process unit bypass stack usage at all times; and
 - Require emissions testing, monitoring, reporting, and recordkeeping relevant to the standards being added.
- EPA is proposing that existing sources demonstrate initial compliance with the new MACT standards within 3 years after the promulgation of the final rule. EPA also proposes that new sources, constructed or reconstructed after the proposal date, would need to demonstrate initial compliance upon the publication date of the final rule or start-up, whichever is later.
- The proposed amendments would protect air quality and public health by reducing emissions of hazardous air pollutants (HAP).
- EPA estimates that the proposed amendments would reduce HAP and volatile organic compound emissions from the PCWP source category by approximately 590 and 8,100 tons per year, respectively.

- EPA estimates the proposed amendments would have a total annual cost to industry of approximately \$51 million per year (in 2021 dollars).

BACKGROUND

- The MACT standards for existing sources are calculated based on the average performance of the best-performing units in each category or subcategory, and the MACT standards for new sources are based on the single best-performing source.
- The PCWP source category includes 99 major source facilities that manufacture plywood, veneer, particleboard, medium density fiberboard, hardboard, fiberboard, oriented strandboard, or engineered wood products; and 124 lumber mills that produce kiln-dried lumber using lumber drying kilns.
- In 2004, EPA published MACT standards for most PCWP dryers and reconstituted wood products presses.
- In 2007, the D.C. Circuit remanded and vacated portions of the 2004 PCWP NESHAP in which EPA concluded that MACT standards for several process units were represented by no emission reduction or no control. *NRDC v. EPA*, 489 F.3d 1364 (D.C. Cir. 2007).
- In 2020, EPA finalized the results of a residual risk and technology review (RTR), where EPA found that the risks associated with air emissions from the PCWP source category (including emissions from unregulated process units) were acceptable and that the current NESHAP provides an ample margin of safety to protect public health.
- In 2020, the D.C. Circuit held in *Louisiana Environmental Action Network (LEAN) v. EPA*, that EPA has an obligation to address unregulated emissions from a source category when the agency conducts an 8-year technology review required by the Clean Air Act (CAA).
- Following publication of the 2020 RTR, EPA received a petition for reconsideration of that rule from environmental groups.
- This proposed rule responds to the 2007 partial remand and vacatur of portions of the 2004 PCWP NESHAP and addresses currently unregulated HAPs from process units in the PCWP source category in response to the *LEAN* decision and 2020 petition for reconsideration. This proposed rule also addresses or invites comment on other issues raised in the 2020 petition for reconsideration.

HOW TO COMMENT

- EPA will accept comments for 45 days after the proposal is published in the Federal Register.
- Comments, identified by Docket ID No. EPA-HQ-OAR-2023-0243 may be submitted by one of the following methods:
 - Go to <https://www.regulations.gov/> and follow the online instructions for submitting comments.
 - Send comments by email to a-and-r-docket@epa.gov, Attention Docket ID No. EPAHQ-OAR-2021- 0243.

- We encourage the public to submit comments via <https://www.regulations.gov/> or email, as there may be a delay in processing mail. Hand deliveries and couriers may be received by scheduled appointment only.
- For further information on EPA Docket Center services and their current status, please visit us online at <https://www.epa.gov/dockets>.

FOR MORE INFORMATION

- Interested parties can download a copy of the final rule notice from EPA's website at the following address: <https://www.epa.gov/stationary-sources-air-pollution/plywood-and-composite-wood-products-manufacture-national-emission>.
- Today's action and other background information are also available electronically at <https://www.regulations.gov/>, EPA's electronic public docket and comment system.