

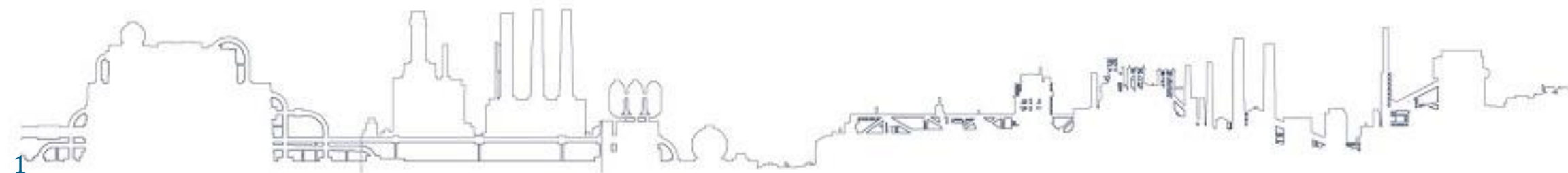


AIR & WASTE MANAGEMENT
ASSOCIATION

Wood Products MACT Training

Amy Marshall, ALL4

March 31, 2021



Logistics

- ❑ Thanks for attending today – everyone is on mute except for Amy and Allison.
- ❑ Please type any questions in the questions box and we will address them at the end.
- ❑ If you'd like a certificate of attendance, please email marketing@all4inc.com to request one.
- ❑ Allison can send out a link to the slides and a recording of the webinar after they are posted.

Agenda

- ❑ Logistics/Introductions
- ❑ What will we cover today?
 - Background on Plywood and Composite Wood Products (PCWP) MACT
 - Why did EPA recently review the rule?
 - 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
- ❑ Questions



PCWP MACT AND RTR OVERVIEW



40 CFR PART 63, SUBPART DDDD

 YOUR ENVIRONMENTAL
COMPLIANCE IS CLEARLY
OUR BUSINESS.

Background on PCWP MACT

- ❑ EPA establishes Maximum Achievable Control Technology for emissions of hazardous air pollutants (HAPs) from various source categories in Part 63.
- ❑ 2004 PCWP **MACT** rule only set standards for certain equipment (e.g., presses, dryers).
- ❑ 2008 court ruling – remanded “miscellaneous sources” to set MACT but no schedule and no formal action by EPA to date.
- ❑ 2020 court ruling affirmed EPA should cover all HAP emissions in MACT rules.
- ❑ EPA assesses Post-MACT “**Residual Risks**” one time – cancer, noncancer, & ecological impacts and ample margin of safety (AMOS) analysis.
- ❑ Every 8 years EPA is supposed to do a “**Technology Review**” – cost-effective control technology improvements?

Results of the PCWP Risk and Technology Review

- 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 cancer risk results were much lower
 - Most of PCWP source category is <10-in-1 million
 - 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.
- However, other changes not related to risk or technology were made...



Startup, Shutdown, and Malfunction (SSM)

- ❑ The 2004 PCWP MACT included a requirement to develop and implement an SSM plan and a compliance exemption for periods of SSM.
- ❑ A 2008 court decision determined SSM exemptions are illegal, so EPA removed them from PCWP MACT with the RTR (EPA also recently removed them from the Part 63 General Provisions).
- ❑ The current SSM requirements sunset on **August 12, 2021** (see Table 10 in the rule). No more SSM plan after that (unless your permit still requires it).
- ❑ New requirements for work practices and reporting start on **August 13, 2021**.



Final Rule Revisions - SSM

- EPA has **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 refiners, 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 in the report if a WP is used more than 100 hours/semi-annual reporting period (**each work practice**, not each piece of equipment or facility total).

Safety Related 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.
- Table 3 to Subpart DDDD: Follow documented site-specific procedures such as use of automated controls or other measures that you have developed to protect workers and equipment to ensure that the flow of raw materials (such as furnish or resin) and fuel or process heat (as applicable) ceases and that material is removed from the process unit(s) as expeditiously as possible given the system design to reduce air emissions.
- *When you follow the work practice and don't exceed allotted time, it is not a deviation or violation.*

Pressurized Refiner Startup and Shutdown

- Pressurized refiner SS Work Practice (Table 3):
 - Route exhaust gases from the pressurized refiner to its dryer control system no later than 15 minutes after wood is fed to the pressurized refiner during startup.
 - Stop wood flow into the pressurized refiner no more than 15 minutes after wood fiber and exhaust gases from the pressurized refiner stop being routed to the dryer during shutdown.
- *When you follow the work practice and don't exceed allotted time, it is not a deviation or violation.*

Direct-Fired Softwood Veneer Dryer Relights

- §63.2250(d) Shutoff of direct-fired burners resulting from partial and full production stoppages of direct-fired softwood veneer dryers or over-temperature events shall be deemed shutdowns and not malfunctions. Lighting or re-lighting any one or all gas burners in direct-fired softwood veneer dryers shall be deemed startups and not malfunctions.
- Table 3 work practice: Cease feeding green veneer into the softwood veneer dryer and minimize the amount of time direct gas-fired softwood veneer dryers are vented to the atmosphere due to the conditions described in §63.2250(d).
- *When you follow the work practice, it is not a deviation or violation.*



New Recordkeeping Requirements (§63.2282)

- Date, time, duration of each startup or shutdown period, including periods when the source was subject to SS WP.
- Date, time, cause, duration, list of affected equipment for each failure to meet an applicable standard.
- For each failure to meet a compliance option (Tables 1A/1B), an estimate of excess emissions.
- For each failure to meet an operating limit or work practice, maintain sufficient information to estimate excess emissions if requested.
- Written procedures for the new WP.



Final Rule Revisions – Testing

- 5-year repeat performance testing requirement for oxidizers (biofilters still test every 2 years). Not required for capture efficiency if no changes to enclosure.
 - First of the 5-yr repeat performance tests due ***within 3 years of 8/13/2020*** or ***60 months after previous PT***, whichever is later (see Table 7).
- Annual RCO catalyst check not required in year of performance test.
- Added a variability margin to biofilter temperature range.
 - Bed temperature range is 10% below the minimum and 10% (not to exceed 8F) above the maximum 15-minute temperatures monitored during testing.

Final Rule Revisions – Reporting

- ❑ Number of instances and time where each SS WP was used. If more than 100 hours each, report date, time, duration of each instance.
- ❑ Report performance testing through ERT, not in SAR.
- ❑ Date and time of any deviation from any requirement.
- ❑ For any failure to meet a compliance option in §63.2240 (emissions limits or required controls), provide an estimate of the quantity of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions.
- ❑ Electronic reporting via CEDRI. <https://www.epa.gov/electronic-reporting-air-emissions/cedri>

[63.2281 semiannual compliance report.xlsx\(V2.00\)](#) (834 K)



Other Final Rule Revisions

- ❑ Revised definition of non-HAP coating with updated OSHA reference (still 0.1% carcinogen and 1% other HAP).
- ❑ Revised requirements for thermocouples to remove the requirement for “calibration” and instead allow several options for semi-annual sensor “validation” checks. §63.2269(b)(4)
 - Use one of the procedures to validate the TC semi-annually or whenever sensor exceeds manufacturer’s operating range or install a new sensor.
- ❑ Clarification that General Provisions requirements for CMS performance evaluations (e.g., notification and submittal) only apply to CEMS, not to parameters like temperature monitoring.



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?



 YOUR ENVIRONMENTAL
COMPLIANCE IS CLEARLY
OUR BUSINESS.

Important Dates / Compliance Calendar

- ❑ Effective date of PCWP RTR rule is August 13, 2020
- ❑ Existing sources – comply with new requirements on August 13, 2021
 - May have to comply with 2 sets of requirements if permit is not revised before then
- ❑ Electronic reporting of test results and compliance reports online via CEDRI. Use CEDRI Excel template for first full semi-annual reporting period after it has been available for 1 year. EPA posted it in December 2020, so use CEDRI for the semi-annual report that covers **Jan-June 2022**.



Actions Needed for RTR Compliance

- ❑ Read the preamble and final rule.
- ❑ Determine what is needed to address new work practices – procedures, automation, 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 reporting template.
- ❑ Update your permit language.



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 using the ERT 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 – *see next slide*.
- ❑ Industry associations working on developing suggested “work practices” for sources without limits.
- ❑ Recent court decision (“LEAN”) – EPA must address “unregulated HAPs.” EPA contemplating an ICR to require testing to fill gaps.
- ❑ Timing: EPA has been sued on the 2020 RTR rule, is negotiating a schedule, likely 2-3 years before a final rule, up to 3 yrs to comply.
- ❑ Engage with your industry association to provide input/comment on the proposed rule.



PCWP MACT “Miscellaneous Sources”

- ❑ Lumber kilns
- ❑ Press pre-dryers
- ❑ Existing board coolers
- ❑ Dry rotary dryers
- ❑ Veneer redryers
- ❑ Hardwood veneer dryers
- ❑ Plywood presses
- ❑ EWP presses
- ❑ Fiber washers
- ❑ Log vats
- ❑ Digesters
- ❑ Agricultural fiber dryers and presses
- ❑ Humidifiers
- ❑ Atmospheric refiners
- ❑ Formers
- ❑ Blenders
- ❑ Saws and Sanders
- ❑ Wastewater operations
- ❑ Miscellaneous coating operations
- ❑ Chippers
- ❑ Tanks



How to Get ALL4 Updates

4 THE RECORD
articles delivered to
your inbox!



ABOUT US / SERVICES / EXPERTISE / INSIGHTS / TRAINING / CAREERS / CONTACT US

Your Environmental Compliance is Our Business

ALL4 is a nationally recognized leader in environmental compliance, responsibility and creating value.

WHAT WE DO

4 The Record is a publication of ALL4's RegTech Group that contains an in-depth look at hot technical and regulatory topics.

Categories:

Category:

2021 Look Ahead: Priorities for a Year of Accelerated Change
Posted: January 21st, 2021
// Colin McCall Each year in our annual Look Ahead Article we face a challenge: assess the landscape in front of us as it exists in January, and attempt to predict how that landscape might shift to identify the most [...] [READ ARTICLE >](#)

ALL4's Texas 2021 Look Ahead
Posted: January 27th, 2021
Goodbye 2020! There has never been a year that literally everyone is unanimously looking to put in the history books and move on. 2020 brought so many challenges to many (all) of you, both personally and in your line of [...] [READ ARTICLE >](#)

U.S. EPA Reverses 2015 SSM SIP Policy
Posted: January 25th, 2021
On October 9, 2020, U.S. EPA released a guidance memorandum to the 10 U.S. EPA regional administrators entitled "Inclusion of Provisions Governing Periods of Startup, Shutdown, and Malfunctions in State Implementation Plans." As the title implies, the memo pertains to [...] [READ ARTICLE >](#)

- 4 The Record Articles
- Podcast
- Webinars
- Presentations

Subscribe to our podcast,
4 THE RECORD: Behind the Scenes

4 THE RECORD: BEHIND THE SCENES
ALL4's Insider Podcast

4 The Record: Behind the Scenes is ALL4's podcast, which we use to keep you informed on the latest changes in the world of air quality regulations and technology.

If you're new to podcasts, here's a quick primer: Podcasts are basically talk radio shows that exist on the internet. They're available anytime and practically anywhere you'd like to listen. To listen on our website, click on an episode below and enjoy. To subscribe on your mobile device, see the detailed instructions in the box below. Thanks again for checking out our podcast!

EPISODE 0: WELCOME!

Introduction
4 The Record: Behind The Scenes
00:00:00 / 00:01:49

powered by Sounder

EPISODE 8: THE NEW FEDERAL ADMINISTRATION CLIMATE PRIORITY

Federal Administration Climate Priority
4 The Record: Behind The Scenes
00:00:00 / 00:14:26

powered by Sounder

EPISODE 7: THE FUTURE OF AIR QUALITY MODELING - PART 2 OF 2

The Future of Air Quality Modeling - Part 2
4 The Record: Behind The Scenes

www.all4inc.com

YOUR ENVIRONMENTAL COMPLIANCE IS CLEARLY OUR BUSINESS.

Questions?

Amy Marshall | amarshall@all4inc.com | 984-777-3073

www.all4inc.com

