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Subject: Meeting Minutes from Flat Wood Paneling Session of Coatings Workshop for the development of the Wood Building Products NESHAP

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To: Project File

Purpose

On April 8 and 9, 1997, the Coatings and Consumer Products Group (CCPG) of the Emission Standards Division (ESD) held a workshop to present information on the standards development process. The CCPG is beginning work on developing national emission standards for hazardous air pollutants (NESHAP) for eight surface coating source categories. As part of the workshop, EPA held breakout sessions with representatives of each of the eight source categories. Following are the meeting minutes for the flat wood paneling breakout session.

Date

April 9, 1997

Session Attendees

Doug Peavy - Georgia Pacific
Mitchell Spell - Georgia Pacific
Paul Vasquez - Georgia Pacific
Tammy Wyles - Georgia Pacific
Bob Wood - Lexington Furniture
Gerry Currier - Akzo Nobel Coatings
Bob Matejka - Akzo Nobel Coatings
Bob Avery - Eastman Chemical Company
Paul Almodovar - EPA/CCPG
Dan Brown - EPA/CCPG
Madeleine Strum - EPA/CCPG
Ingrid Ward - EPA/PRG
Amy Marshall - Midwest Research Institute
Susan Rasor - Midwest Research Institute

Discussion

After introductions, the representative from Georgia Pacific were asked to provide background information on their flat wood paneling operations. Georgia Pacific manufactures both interior and exterior paneling. Although most of Georgia Pacific's plants are in attainment areas and are not subject to the limits included in the control techniques guideline (CTG) document for flat wood paneling, most of the coatings they use at these plants do meet the CTG limits. The majority of the coatings are waterborne coatings. The panels may be made of particleboard, plywood, or solid wood. For some panels, a paper laminate or overlay is applied to the substrate and a protective and/or decorative coating is applied over the paper. The type of adhesive used for laminating varies. Contact adhesives, polyvinyl acetate adhesives, and urea-formaldehyde adhesives are all used. Some panels are printed rather than coated. Most coatings are applied on a flatline using curtain or roll coating, but some are spray applied. For example, spray coating is used for wall paneling with grooves.

The Georgia Pacific representative indicated they had approximately six facilities doing surface coating of flat wood paneling. Some of these facilities also manufacture the substrate. The Georgia Pacific representatives indicated they were concerned about the potential overlap between the flat wood paneling NESHAP and the upcoming particleboard/plywood manufacturing NESHAP. In particular, they expressed concern about the potential economic impact of two standards on one facility. In addition to the potential overlap between the flat wood paneling NESHAP and the particleboard/plywood NESHAP, the Georgia Pacific representatives also questioned whether or not there was overlap with the printing and publishing NESHAP, the paper and other web coating NESHAP, and the wood furniture NESHAP. Ms. Rasor indicated that unless the coated panels were subsequently used by wood furniture manufacturers, they would not be covered under the wood furniture NESHAP. Mr. Almodovar indicated that EPA would coordinate with the paper and other web coating and printing and publishing project teams to evaluate the potential overlap with these standards.

The discussion then moved on to the scope of the standard. The current CTG only includes limits for interior paneling. In addition to exterior paneling, there are other products such as moldings, cedar shingles, wood flooring, cementitious board (panel made of cement with wood fibers), doors, and window frames that are manufactured using a similar process. None of these products were covered under the wood furniture NESHAP. Mr. Almodovar of EPA indicated that the EPA had not yet made a final decision on what products might be included in the source category. This is an issue the EPA will be addressing in the early stages of the standards development process.

Ms. Rasor asked about the possibility of site visits to Georgia Pacific facilities. They indicated they would like EPA to visit. In addition, both Akzo and Lilly, who are suppliers to the industry, indicated it would be worthwhile for EPA to visit their coating manufacturing facilities. They have examples of the types of products that might be covered under the flat wood paneling NESHAP and the equipment used for coating.

The breakout session concluded with a summary of the issues that need to be addressed as the standards development process continues. The group agreed there were four major issues that were specific to this source category. These are summarized below.

1. Overlap with other NESHAP. As discussed earlier, the group believes there is the potential for overlap with four other NESHAP including wood furniture, paper and other web coating, printing and publishing, and particleboard/plywood manufacturing.

2. Overlap with other non-EPA standards/requirements. While this was not a major discussion area, the group did discuss the potential impact of OSHA requirements and wood product certification requirements. The OSHA concern is based on industry concerns that as capture efficiency requirements are tightened, worker exposure issues under OSHA may come into play. Less air flow means that workers may be exposed to higher concentrations of chemicals.

Many of the products manufactured by the industry are subject to requirements related to fire and weather resistance. Changing the coatings these facilities use can have an impact on their resistance to fire and weather.

3. Only one flat wood paneling manufacturer, Georgia Pacific, was present at the breakout session. The group discussed who else should be involved and how they could be contacted. The group developed a list of trade associations that should be involved in the standards development process. Included on this list are the following associations:

- American Plywood Association (APA)
- National Particleboard Association (NPA)
- American Forest and Paper Association (AFPA)
- National Paint and Coatings Association (NPCA)
- Hardwood Plywood and Veneer Association (HPVA)

4. The group also raised three issues directly related to rule development. These included economic impact, for example, the combined impact on one facility of multiple standards, flexibility, and recordkeeping.

In addition to these four issues specific to flat wood paneling, Mr. Bob Avery indicated that one issue important to the Chemical Manufacturers Association (CMA) on all the surface coating regulations is the reporting requirement on certified product data sheets (CPDS). The specific issue is setting a de minimis concentration for reporting HAP on the CPDS. Some of the surface coating regulations require reporting of HAP in concentrations greater than 1 percent, except for carcinogens which must be reported if they are present in concentrations greater than 0.1 percent. The printing and publishing NESHAP requires reporting of all HAP present at concentrations greater than 0.1 percent. The CMA believes that the 0.1 percent reporting requirement for all HAP is too burdensome and is difficult to comply with because all solvents

contain trace amounts of contaminants. Reporting all HAP to the 0.1 percent level will greatly increase testing costs. Again, CMA believes this is an issue that EPA should address for all the surface coating regulations.

The breakout session adjourned with a discussion of the standards development process. Paul Almodovar indicated that EPA would contact the trade associations indicated to determine their interest in participating in the PMACT process. After contacting the interested parties, EPA will schedule a PMACT kickoff meeting for flat wood paneling. All of the breakout session attendees will be notified of the kickoff meeting.