

Mr_Ms First name Last name
Title
Company
Street address
City, State Zip

Dear Mr_Ms Last name:

The U. S. Environmental Protection Agency (EPA) is compiling detailed information on sources and quantities of hazardous air pollutant (HAP) emissions and techniques for controlling these emissions. This information will be used in setting national emission standards for hazardous air pollutants (NESHAP). Section 112 of the Clean Air Act (the Act), as amended November 1990, requires the EPA to regulate industries that emit HAP listed in Section 112(b). The EPA has determined that many millwork, panel, and reconstituted wood manufacturers (as a segment of the wood building products industry) may reasonably be anticipated to emit HAP in quantities sufficient to designate them as major sources: i.e., facilities that emit 10 tons or more of any one HAP or 25 tons or more of any combination of HAP. As a consequence, the wood building products (surface coating) industry is on the list of HAP-emitting source categories selected for regulation. The EPA is required to promulgate standards for this industry no later than November 15, 2000.

Emission standards promulgated under Section 112(d) are to be technology-based and are to require the maximum degree of emission reduction determined to be achievable by the Administrator. These standards have been termed maximum achievable control technology (MACT) standards. For new sources, these MACT standards "... shall not be less stringent than the emission control that is achieved in practice by the best controlled similar source ...". For existing sources, the standards "... shall not be less stringent ... than ... the average emission limitation achieved by the best performing 12 percent of the existing sources (for which the Administrator has emissions information) ...".

To ensure that regulations that may affect the wood building products (surface coating) industry are based upon sound and current data, I am exercising authority granted to me by the Act to ask your help in securing that needed information. This letter requests information on your millwork, panel, and reconstituted wood manufacturing operations

am asking you to submit information for all facilities in your company that conduct surface coating operations involving wood building products.

Enclosure 1 itemizes the information we are requesting. Using this information, in conjunction with analogous information collected from other companies, the EPA will quantify HAP emissions, define the current status of emission control, and assess environmental, energy, and economic impacts associated with installing and operating feasible emission control techniques. We are sensitive to the amount of labor required to respond to this request. Therefore, we have tried to limit the information requested to only those features important to regulatory development to minimize demands on your time. I would like to assure you that nothing is being requested that we do not feel is necessary to achieve the objectives stated above. You may respond "Not Applicable" to questions that do not apply to your facility.

The EPA's authority to gather information is presented in Section 114 of the Act, as amended (42 U.S.C. 7414). Enclosure 2 contains a summary of this authority. If you believe that a disclosure of any specific information that you submit would reveal a trade secret, clearly identify such information. Refer to Enclosure 2 for the information the EPA may require, at a later time, to support your confidentiality claims. Any information determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice (40 CFR Part 2.203, September 1, 1976). Because Section 114 of the Act exempts emission data from claims of confidentiality, the emission data you provide may be made available to the public. A clarification of what the EPA considers to be emission data is contained in Enclosure 3.

The EPA has contracted Midwest Research Institute (MRI) (Contract No. 68-D6-0012) to obtain information pertinent to the industry. Thus, as noted in Enclosure 4, MRI has been designated by the EPA as an authorized representative of the Agency. Therefore, MRI has the rights discussed above and in Enclosure 2. Accordingly, MRI will have access to all information provided to EPA in response to this request. As a designated representative of the

Agency, MRI is subject to the provisions of 42 U.S.C. 7414 respecting confidentiality of methods or processes entitled to protection as trade secrets.

Enclosure 5 summarizes EPA policies and procedures for handling privileged information and describes EPA contractor commitments for using confidential materials. It is the EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 5 provides sufficient protection for the rights of submitters of privileged information.

I am requesting that you return the completed questionnaire by August 7, 1998. I am sure you understand how vital it is for the EPA to use the very best information available to develop the most meaningful standard. Your help in providing this information is greatly appreciated. If you have questions regarding the need for this survey or the information request, please contact Mr. Paul Almodovar, Coatings and Consumer Products Group, at (919) 541-0283.

Sincerely,

A handwritten signature in black ink that reads "Bruce C. Jordan". The signature is written in a cursive style with a large, looping initial "B".

Bruce C. Jordan
Director
Emission Standards Division

5 Enclosures

cc: State ccs
Region ccs