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Subject: Second PMACT Roundtable Meeting for the development of the Wood Building Products NESHAP

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To: Project File

I. Introduction

A second roundtable meeting with the flatwood paneling industry was held on August 12, 1997. The primary purpose of the meeting was to discuss the project status and to present some draft definitions to the roundtable participants for comment. The discussion focused on the goals of the PMACT process for the flatwood paneling industry, data collection activities, the draft definitions, and the project schedule. Table 1 presents a list of meeting participants.

II. Discussion

After introductions, Mr. Paul Almodovar, the Coatings and Consumer Products Group's (CCPG) Task Officer for the development of standards for the flatwood paneling industry, presented the EPA's position on PMACT for the flatwood paneling industry. Mr. Almodovar indicated that because the EPA was expanding the source category beyond that used for the 1978 Control Techniques Guideline (CTG) document and that many of the segments of the newly defined source category were not subject to prior standards, the EPA has decided not to develop PMACT for the flatwood paneling industry. Instead, the goal of the PMACT process for this industry will be to finalize the source category definition and develop a profile of the industry. The profile will include a description of the types of products manufactured by the industry, the manufacturing process, emission sources, and pollution prevention/control technologies being used by the industry. The draft profile will be used to focus additional data gathering activities in specific areas that will be required to develop MACT for the source category.

Mr. Almodovar and Ms. Linda Herring, the CCPG Group Leader, also clarified the PMACT process. The EPA has received feedback from other industry groups questioning the need for PMACT and what they perceived as EPA's ambitious schedule for developing PMACT. Ms. Herring indicated that PMACT was always just a step in the MACT development process, not a goal of the process. If PMACT can be developed for a source category, then the EPA will do so in order to provide guidance to the States in making case-by-case MACT determination. If the initial information gathering activities do not lead to PMACT, as is the case with the flatwood

paneling industry, then the EPA does not plan to expend additional time and resources in developing PMACT. Instead, the data gathered during the PMACT process will enable the EPA to focus their data collection activities in specific areas for the development of MACT. Ms. Herring indicated that she had prepared a document stating the CCPG's position on PMACT and that the EPA would share this document with the members of the roundtable.

The discussion then moved to an overview of current and future data collection activities. Ms. Susan Razor of Midwest Research Institute told the group that the EPA was setting up site visits to several types of facilities. These include an interior paneling manufacturing facility, a door manufacturing facility, a miscellaneous millwork manufacturing facility, and a facility that provides stock finished wood products for the furniture industry and for building construction. The primary purpose of these site visits is to provide the EPA with an overview of the types of products manufactured by the industry, the manufacturing process, and emission sources at flatwood paneling manufacturing facilities. This information will then be used in developing the draft industry profile and in developing an information collection request (ICR) for the industry. The data collected from the ICR will be used to establish the MACT floor for the industry. The EPA is also developing a survey for coating suppliers. The survey will include questions on the types of coatings supplied to the flatwood paneling industry, the types of coating technologies, and the VOC and HAP contents of those coatings.

Mr. Almodovar then presented the project schedule. Site visits are currently planned for August and September. The draft industry profile should be completed by mid-to-late October. The survey of coating suppliers will likely be sent out in October, although that date may change based on the schedule of the other project teams. To reduce the burden on suppliers who supply coatings to multiple industries, the surveys may be coordinated with the project teams working on the other coating standards. The draft ICR for the industry is scheduled to be completed in November.

Finally, Ms. Razor presented some draft definitions to the roundtable participants. The definitions, which are provided in Attachment 1, are for wood building products, finished wood building products, and laminated wood building products. These definitions, when finalized, will provide the basis for defining the source category. While some initial comments on the definitions were provided during the meeting, Ms. Razor asked the group to provide written comments to her by the end of August. These comments will then be compiled and made available to the group. The EPA will then work with the roundtable participants to finalize the definitions based on the comments received from the participants.

The meeting ended with a brief discussion of other groups or associations that could potentially be affected by the standard and that should be included in the roundtable. The participants reiterated the need to have the associations representing facilities that are primarily laminating participate in the roundtable. Ms. Razor indicated that these groups had been contacted but had not responded. Ms. Razor said she would try to contact them again. Mr. Brock Landry, who participated in the meeting as a representative of the Amino and Phenolic

Wood Adhesive Association, was also asked to contact the Adhesive and Sealants Council, who he also represents, to determine their interest in participating in the roundtable. Finally, Ms. Rasor indicated that she had sent out the announcement materials to the associations representing modular home manufacturers and prefabricated homes manufacturers after receiving some permits for a few of these facilities that indicated they may be subject to this regulation. Mr. Wagner indicated that he had talked to a representative of one of the associations and they did not believe their members would be affected. Ms. Rasor indicated she would review the permits again to determine the potential applicability of the standard to these facilities.

TABLE 1. Presents a List of Meeting Participants

Members	Affiliation
Paul Almodovar	U.S. Environmental Protection Agency (EPA)
Trish Koman	EPA
Maggie Corbin	Puget Sound Air Pollution Control Agency
Gary Corrier	Akzo Nobel Coatings Inc.
Gary Gramp	Hardwood Plywood and Veneer Association
Linda Herring	EPA
Ken Isreal	EPA, Region 9
Rob Kaufmann	American Forest and Paper Association
Brok Laundry	Venetable et all
Robert Matejka	Akzo Nobel Coatings Inc.
Venkata Panchakarla	Florida Department of Environmental Quality
Susan Rasor	Midwest Research Institute (MRI)
Alex Ross	Radtech
Anthony Saltis	MRI
Sherry Stookey	Lilly
Chuck Voit	Weyerhaeuser
Louis Wagner	American Hardboard Association
Paul Wilson	PPG
Tammy Wyles	Georgia Pacific