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Subject: Minutes for Meeting with Flatwood Paneling Regulatory Subgroup for the development of the Wood Building Products NESHAP

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To: Project File

I. Introduction

The initial meeting of the flatwood paneling regulatory subgroup was held on June 10, 1997. The primary purpose of the meeting was to update the members of the regulatory subgroup on the status of the project, to discuss the role of the regulatory subgroup, to discuss issues raised, and to review the project schedule. The discussion focused on activities conducted to date by the EPA, the definition of flatwood paneling, the role of PMACT in the standards development process, and how the regulatory subgroup could assist in data gathering activities.

II. Attendees

All current members of the flatwood paneling regulatory subgroup participated in the meeting. Table 1 presents the list of participants and their affiliation.

TABLE 1. Meeting Participants

Participant	Affiliation
Paul Almodovar	EPA/CCPG
Susan Rasor	Midwest Research Institute
Tony Saltis	Midwest Research Institute
Maggie Corbin	Puget Sound Air Pollution Control Agency
Gerald Ebersole	Oregon Department of Environmental Quality
Venkata Penchakarla	Florida Dept. Of Environmental Protection
Saba Tahmassebi	Oklahoma Dept. of Environmental Quality

III. Discussion

Mr. Almodovar opened the meeting with a discussion of PMACT. Mr. Almodovar informed the regulatory subgroup that representatives from other industries had written a letter to the EPA expressing concern about the PMACT process and the need to develop PMACT by late fall of 1997. Mr. Almodovar indicated that the EPA is de-emphasizing the focus on PMACT and focusing on data collection activities that are necessary whether PMACT is developed or not. He indicated that for the flatwood paneling industry, the EPA will likely not develop PMACT because the majority of the industry has not been regulated to date. The focus over the next few months will be on characterizing the source category and collecting background information on facilities in the source category.

Ms. Rasor then presented an overview of the project status and data collection activities. She indicated that the EPA is focusing on all wood building products, not just the products covered under the original CTG. The original CTG focused only on interior paneling primarily because at that point in time that segment of the industry was using waterborne coatings but other segments of the industry were not. The regulatory subgroup agreed with the EPA that all wood building products should be covered under the regulation. At least two other States have expanded the definition to include wood products other than interior paneling. Ms. Corbin asked if the EPA planned to cover products that were finished in a spray booth or just those products finished on a flatline. Ms. Corbin said that many of the facilities in her area use spray finishing. Ms. Rasor replied that the standard will not be limited to products finished on a flatline; products that are spray finished in a booth will also be covered.

Ms. Rasor indicated that the EPA and MRI had developed a list of standard industrial classification (SIC) codes that included the manufacture of wood building products. Midwest Research Institute used this list to conduct a search of the Toxic Release Inventory (TRI) data base for information on the types of pollutants emitted by the industry and the number of major sources in the industry. However, Ms. Rasor indicated that the usefulness of the TRI data is somewhat limited because the SIC codes of interest include facilities that manufacture the substrate as well as finish or laminate the substrate. The TRI data does not identify the source of the emissions. Ms. Rasor indicated that the project team had also tried to collect Title V applications for flatwood paneling facilities, but the team had only limited success in doing so because only a few States have their applications online and others are too busy to identify and copy the applications. The members of the regulatory subgroup stated they would download the applications for facilities in their areas and provide the applications to the EPA. Ms. Rasor said she would provide each regulatory subgroup member with a list of the SIC codes of interest.

The focus of the meeting shifted to future data collection activities. Ms. Rasor indicated that the project team was developing a survey for the coating suppliers. The coating suppliers can provide valuable information on coating technologies and the VOC and HAP contents of the coatings used by the industry. The project team is also trying to identify facilities for site visits. Ms. Corbin indicated that the facilities in her area were cooperative, and she thought they would

be willing for the EPA to visit. Ms. Corbin said she would provide the EPA with contacts for these facilities.

In the future, the EPA will develop a survey of flatwood paneling manufacturers to identify the best performing 12 percent of sources in the industry. The information collected through the site visits, Title V applications, and the survey of coating suppliers will be used to develop the survey.

Finally, the group discussed the project schedule. Mr. Almodovar said that the tentative date for the second roundtable meeting was the week of August 11. Initially, the EPA had planned to present PMACT options at that meeting, but Mr. Almodovar stated that the focus will now be on the information collected on the industry to date, finalizing a definition for the source category, and discussing future information collection activities.