



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 15, 2022

Mr. Steve Hall
Section Chief, Technical Services
Division of Air Quality
North Carolina Department of Environmental Quality
217 West Jones Street
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Dear Mr. Hall:

This is in response to your letter of request, dated May 10, 2022, to the U.S. Environmental Protection Agency for a regulatory interpretation (RI) regarding EGGER's June 30, 2021, alternative emission limit request to the North Carolina Division of Air Quality (NCDAQ). As stated in your letter, a request of this nature must be submitted to the EPA for a response. EGGER operates a new source reconstituted wood products press and board cooler at its facility in Linwood, North Carolina. The facility has elected to comply with the process unit production-based total HAP basis compliance options in Table 1A of Title 40, Code of Federal Regulations (CFR), Part 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (PCWP). Based on EGGER's request and information provided by the NCDAQ, the EPA could not approve EGGER's request. Details regarding the basis for our RI are provided in the remainder of this letter.

Background Information Supporting Request

On June 30, 2021, EGGER submitted a request to the NCDAQ seeking to sum the process unit production-based total HAP basis compliance options of reconstituted wood product board coolers @ 0.014 lb of total HAP on a thousand square feet basis of three-quarter inch wood product thickness (lb/MSF 3/4") and reconstituted wood product presses @ 0.30 lb/MSF 3/4" from Table 1A to Subpart DDDD into one production-based total HAP basis compliance option of 0.314 lb/MSF 3/4" at the combined discharge stack for both affected sources and use the option to assess compliance with the rule's emission standards.

EPA's Review of the Relevant Subpart A General Provisions and Subpart DDDD Standards

Under § 63.2231, Subpart DDDD applies to facilities which are major sources of HAP emissions that own or operate a plywood and composite wood products (PCWP) manufacturing facility which "manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product, which includes facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited

to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.”

Under § 63.2232(a-b), Subpart DDDD applies to “the collection of dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing of plywood and composite wood products. The affected source includes, but is not limited to, green end operations, refining, drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), resin preparation, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)). The affected source also includes onsite storage and preparation of raw materials used in the manufacture of plywood and/or composite wood products, such as resins; onsite wastewater treatment operations specifically associated with plywood and composite wood products manufacturing; and miscellaneous coating operations (§ 63.2292). The affected source includes lumber kilns at PCWP manufacturing facilities and at any other kind of facility.”

Under § 63.2232(c), an affected source is a new affected source if you commenced construction of the affected source after January 9, 2003, and you meet the applicability criteria at the time you commenced construction.

Under § 63.2240(a), for production-based compliance options which do not use an add on control device, owners and operators of affected sources using production-based compliance options must meet the process unit total HAP basis production-based compliance options in Table 1A to Subpart DDDD. Under Table 1A to Subpart DDDD, owners or operators must meet the total HAP production-based compliance options of 0.014 lb/MSF 3/4" and 0.30 lb/MSF 3/4" for reconstituted wood product board coolers (at new affected sources) and reconstituted wood product presses, respectively.

Under § 63.2267 owners or operators of a reconstituted wood product press or a reconstituted wood product board cooler (at a new affected source) must either use a wood products enclosure as defined in § 63.2292 or measure the capture efficiency of the capture device for the press or board cooler using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as appropriate) or the alternative tracer gas method contained in appendix A to Part 63. Owners or operators must submit documentation that the wood products enclosure meets the press enclosure design criteria in § 63.2292 or the results of the capture efficiency verification with the Notification of Compliance Status.


EPA's Determination

Subpart DDDDD specifies process unit production-based total HAP basis compliance options for reconstituted wood product board coolers (at new affected sources) and reconstituted wood product presses in Table 1A to subpart DDDD but does not include rule-specific provisions to allow summing of the options in Table 1A to demonstrate compliance with the rule. Based on information received from the NCDAQ, EGGGER demonstrated, by testing performed in May 2021, compliance assessments may be evaluated independently for each process unit production-based total HAP basis compliance option (e.g., the reconstituted wood product board cooler or reconstituted wood product press). For this reason, the EPA could not approve EGGGER's alternative nonopacity emission limit request.

The review of your RI request was coordinated with the EPA Office of Enforcement and Compliance Assurance and the EPA Office of Air Quality Planning and Standards. If you have any questions about the response provided in this letter, please contact Mr. Tracy Watson of my staff at (404) 562-8998 or by email at watson.marion@epa.gov.

Sincerely,

**CAROLINE
FREEMAN**

 Digitally signed by CAROLINE
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Date: 2022.06.15 19:19:40 -04'00'

Caroline Y. Freeman
Director
Air and Radiation Division

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