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NESHAP/Clean Air Act: U.S. Environmental Protection Agency Proposes Amendments for Plywood/Composite Wood Products Category

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The United States Environmental Protection Agency (“EPA”) has issued a prepublication proposed rule addressing the Clean Air Act National Emission Standards for Hazardous Air Pollutants (“NESHAP”) for the plywood and composite wood products (“PCWP”) category.

The proposal responds to a 2007 partial remand and vacatur of portions of the 2004 PCWP NESHAP in which EPA states it previously concluded maximum achievable control technology was represented by no control (i.e., no emissions reduction).

The PCWP category is defined by EPA as:

... any facility engaged in the manufacturing of plywood and/or particle boards.

See 40 CFR, Subpart DDDD.

The category is stated to include, but not be limited to the manufacturing of:

- Chip waferboard
- Strandboard
- Waferboard
- Hardboard/cellulosic fiber board
- Oriented strandboard
- Hardboard plywood
- Medium density fiberboard
- Particleboard
- Softwood plywood
- Other processes using wood and binder systems

EPA states that to ensure all emissions of hazardous air pollutants (“HAPs”) from sources in this category are regulated, it is proposing standards for processes currently unregulated, including:

- Total HAP, including:
- Acetaldehyde
- Acrolein

- Formaldehyde
- Methanol
- Phenol
- Propionaldehyde
- Non-mercury HAP metals
- Mercury
- Hydrogen chloride
- Polycyclic aromatic hydrocarbons
- Dioxin/furan
- Methylene diphenyl diisocyanate

Emission limits and work practices for PCWP process units in lumber kilns at facilities that are major sources of HAP emissions are proposed.

A copy of the prepublication proposed rule can be downloaded [here](#).