

6. Propionaldehyde

No information is available on the acute (short-term) effects of propionaldehyde in humans. Animal studies have reported that inhalation exposure to high levels of propionaldehyde results in anesthesia and liver damage. No information is available on the chronic (long-term), reproductive, developmental or carcinogenic effects of propionaldehyde in animals or humans. We have not classified propionaldehyde for carcinogenicity.

F. Incorporation by Reference of NCASI Test Methods

With today's action, we are proposing to amend 40 CFR 63.14 by revising paragraph (f) to incorporate by reference two test methods developed by the National Council of the Paper Industry for Air and Stream Improvement (NCASI): (1) Method CI/WP-98.01, Chilled Impinger Method for Use at Wood Products Mills to Measure Formaldehyde, Methanol, and Phenol; and (2) pending review by EPA, Method IM/CAN/WP-99.01, Impinger/Canister Source Sampling Method for Selected HAPs at Wood Products Facilities. These methods are available from the NCASI, Methods Manual, P.O. Box 133318, Research Triangle Park, NC 27709-3318 or at <http://www.ncasi.org>. They are also available from the docket for this proposed rule (Docket Number A-98-44).

In today's proposed rule, NCASI Method CI/WP-98.01 would be allowed as an alternative to:

- EPA Method 320, Measurement of Vapor Phase Organic and Inorganic Emission by Extractive FTIR, for measuring methanol or formaldehyde;
- EPA Method 0011, Sampling for Selected Aldehyde and Ketone Emissions from Stationary Sources, for measuring formaldehyde;
- EPA Method 316, Sampling and Analysis for Formaldehyde Emissions from Stationary Sources in the Mineral Wool and Wool Fiberglass Industries, for measuring formaldehyde;
- EPA Method 308, Procedure for Determination of Methanol Emission from Stationary Sources, for measuring methanol; and
- NCASI Method IM/CAN/WP-99.01 for measuring formaldehyde or methanol.

The NCASI Method CI/WP-98.01 has been validated using EPA Method 301, Field Validation of Pollutant Measurement Methods from Various Waste Media, for measuring methanol, formaldehyde, and phenol emissions from PCWP facilities. (EPA Method 0011 is available in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication No. SW-846. EPA Methods 301, 308, 316, and 320 are in 40 CFR part 63, appendix A.)

In today's proposed rule, NCASI Method IM/CAN/WP-99.01, which is a self-validating method, would be allowed, pending our review, as an alternative to:

- EPA Method 320, for measuring methanol, formaldehyde, or total HAP;
- EPA Methods 0011 and 316, for measuring formaldehyde;
- EPA Method 308, for measuring methanol; and
- NCASI Method CI/WP-98.01, for measuring formaldehyde or methanol.

G. Alternative Procedure for Determining Press Enclosure Capture Efficiency

We are working with industry representatives to develop a procedure that uses measurement of tracer gas to determine capture efficiency. We are proposing this "tracer gas procedure" today in appendix A to the proposed subpart DDDD.

H. Changes to the Scope of a Source Category

Today's action serves to broaden the PCWP source category to include lumber kilns located at stand-alone kiln-dried lumber manufacturing facilities or at any other type of facility. Wood products industry representatives requested that all lumber kilns (regardless of location) be considered in today's proposed rule so there would be one MACT determination for all lumber kilns nationwide. If lumber kilns at stand-alone kiln-dried lumber manufacturing facilities and other types of facilities are not included in the PCWP NESHAP, kiln-dried lumber manufacturing could be listed as a major source category under section 112(c) of the CAA in the future, requiring a separate section 112(d) rulemaking, and may become separately subject to the provisions of section 112(g) of the CAA

as well. Because the design and operation of lumber kilns are essentially the same regardless of whether the kilns are located at a sawmill or are co-located with PCWP or other types of manufacturing operations, we have included lumber kilns in the PCWP source category. Broadening the scope of the PCWP source category to include lumber kilns located at any type of facility is reasonable because based on our information, there are no currently applicable controls at any lumber kilns and it is both more efficient and expeditious to include them in the MACT process now than to separately address them in a rulemaking that would not likely result in meaningful emissions reductions from lumber kilns. Moreover, including all lumber kilns in the PCWP MACT results in placing them on a faster schedule for purposes of future residual risk analysis under CAA section 112(f).

II. Summary of Proposed Rule

A. What Process Units Are Subject to This Proposed Rule?

The proposed rule would regulate HAP emissions from PCWP facilities that are major sources. Plywood and composite wood products are manufactured by bonding wood material (fibers, particles, strands, *etc.*) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include 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. Table 1 of this preamble lists the process units at PCWP facilities and indicates which process units are subject to the control requirements in today's proposed rule. "Process unit" means equipment classified according to its function such as a blender, dryer, press, former, or board cooler.