

PROJECT REPORT

Wood Building Products
Surface Coating NESHAP

SCOPE



SMALL COMMUNITIES OUTREACH
PROJECT FOR ENVIRONMENTAL ISSUES

*A cooperative agreement between the US EPA and NASPAA
for the benefit of small communities*

NATIONAL ASSOCIATION OF SCHOOLS OF PUBLIC AFFAIRS AND ADMINISTRATION

NOTE: The US EPA relied on SCOPE's findings as support for its determination that proposed standards will have a minimal impact on certain small entities. See National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products; Proposed Rule [Federal Register: June 21, 2002 (Volume 67, No. 120)] [Proposed Rules] [Pages 42400 - 42447] at 42416.

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September 2000

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This report is compiled from field reports written by the SCOPE teams of faculty and graduate students. **Stanley M. Caress**, Associate Professor of Political Science and Planning at the **State University of West Georgia**; Cole Taratoot, Master of Public Administration program. **A. Hunter Bacot**, Associate Professor of Political Science, **University of North Carolina, Charlotte**; Sumetrice Long, Jennifer Plagman-Galvin, Jason Green. **Craig Shinn**, Associate Professor of Public Administration, **Mark O. Hatfield School of Government, Division of Public Administration, Portland State University**, Shannon Mayfield-Porter, Master's in Public Administration with concentration in Natural Resource Policy and Administration, Lisa Watson, Master's of Business Administration. **Beverly A. Cigler**, Professor of Public Policy and Administration, **Penn State Harrisburg, and Director of the Pa Program to Improve State and Local Government**; Matthew Davies, master's student in environmental engineering, School of Science, Engineering, and Technology; Maya Leggett, second year student at the Hershey Medical School, Penn State's College of Medicine.

SCOPE's project director is **Deborah Rosenbloom, Esq., Director of Public Policy and Law at the National Association of Schools of Public Affairs and Administration**. SCOPE's student interns were Andrew Luxen, University of Colorado at Boulder and Melissa Zimmerman, Master of Public Policy, George Washington University. **Arthur (Andy) Felts, Director of the Institute for Public Affairs and Policy Studies, College of Charleston, SC** is serving as SCOPE's evaluator.

Executive Summary

Small Communities Outreach Project for Environmental Issues (SCOPE)

Mission. SCOPE's mission is to minimize adverse impacts of environmental rulemakings on small communities while maintaining their intended environmental and health benefits. SCOPE operates during the early stages of regulatory development. SCOPE is a way for small entities to learn about rules as they are being written and to identify and communicate potential impacts.

Method. SCOPE meetings occur within the small entities' home communities, and are facilitated by independent local experts in community affairs. Meetings are structured around facilitation guides developed in consultation with the US EPA. All facilitators have faculty appointments in graduate programs of public affairs and administration and/or Local Government Institutes. These programs and institutes regularly provide development, training, and evaluation services to local governments and are members of the National Association of Schools of Public Affairs and Administration. This large pool of experts located throughout the United States ensures that SCOPE teams can be created based on an assessment of where the rules are likely to have the largest impact on small entities. As neutral experts with a public service mission, SCOPE teams bring the highest caliber of professional expertise to the early consultation process.

Mechanism. SCOPE creates a mechanism for small entities to:

- learn about regulatory developments that may impact them
- discuss concerns and ideas about the regulatory developments
- communicate concerns to all interested parties.

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Issue. Pursuant to the authority of the Clean Air Act, the US EPA Office of Air Quality, Planning and Standards, Emissions Standards Division, Coatings and Consumer Products Group is currently developing national standards to limit emissions from wood building products surface coating facilities. The EPA regulates the emissions of HAPs from stationary sources by establishing national emission standards (NESHAP). The statute requires the EPA to establish standards to reflect the maximum degree of reduction in HAP emissions through application of "maximum achievable control technology" (MACT) to major sources. A major source is "any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, considering controls, in the aggregate, 10 tons per year or more of any HAP or 25 or more of any combination of HAP." (Clean Air Act, Section 112(a)(1)). HAPs emissions from wood building products surface coating typically happen during coating applications, drying/curing operations, mixing or thinning operations, and any associated cleaning operations. The rule will set emission limits for facilities that both coat these products and are "major sources" of HAPs. The regulations will have compliance options

that include pollution prevention methods, traditional emissions capture and control, or some combination of these two options. Pollution prevention includes using low or no HAP chemicals in the coating process. Examples of these include waterborne coatings, high solid coatings, powder coatings, radiation cured coatings, including ultraviolet (UV) cured or electron beam (EB) cured coatings. Traditional emissions capture and control devices include thermal incinerators, scrubbers, and filters.

Findings. SCOPE's findings are a result of conversations and meetings with small business owners and representatives of small jurisdictions from June 2000 through July 2000 in Georgia, North Carolina, Oregon, and Pennsylvania. The discussions focused on the implications of the NESHAPs under development that will limit emissions of hazardous air pollutants from wood building products surface coatings facilities. Because of the nature of the methodology, the difficulties in locating these businesses, and the short time frame in which to do the work, SCOPE presents these findings as generally reflective of the concerns of the small entities.

- Working with businesses as partners to create whole systems approach to pollution prevention will reduce their regulatory burden and will yield greater compliance.
- More and better communication with small entities is necessary to notify, educate and train. Placing information on the internet is not sufficient notice or communication.
- A regional approach to environmental policy and implementation will ease the regulatory burden on small entities.
- Businesses are interested in being good neighbors but risk communication must be convincing.
- On-site, third-party training is valued by small entities as a way to achieve compliance.
- Compliance guidance must be readily comprehensible and compliance checklists would be useful.
- Suppliers should be used as a resource for working with businesses to achieve compliance.
- While quality concerns are a factor in deciding whether to use pollution prevention coatings, particularly for high end custom work, businesses are aware of their availability.
- 'Green marketing' and educating the end consumer about the benefits of purchasing wood building products that are coated by environmentally friendly means will support the industry by changing the nature of consumer demand.
- Reformulation from solvent-based coatings to waterborne coatings is the most viable pollution prevention option for the smaller businesses.

- Small wood building products surface coating facility owners/operators are unsure about the type and/or amount of emissions produced by their facilities.
- Consistent measurement units for regulatory record keeping and Material Safety Data Sheets (MSDS) will ease the regulatory burden on small businesses.