



Minnesota Pollution
Control Agency

520 Lafayette Road
St. Paul, MN 55155-4194

Initial Notification Report/ Notification of Compliance Status

Wood Preserving Area Source National Emission Standard for Hazardous Air Pollutants (NESHAP)

An initial notification and certification of compliance are required by 40 CFR 63.11432 and 40 CFR 63.9(b)(2) for new and existing area sources subject to the conditions of Subpart QQQQQQ, Wood Preserving Area Sources.

I. General Information

Operating permit number (if available): _____ Air quality facility ID number (if available): _____

Owner/Operator:

Name: _____ Date: _____
Title: _____ Phone: _____
Email: _____ Fax: _____
Address: _____
City: _____ State: _____ Zip: _____

Facility information:

Facility Name: _____ Phone: _____
Address: _____ Fax: _____
(physical location) _____
City: _____ State: _____ Zip: _____

Facility contact:

Name: _____ Date: _____
Signature: _____ Phone: _____
Title: _____ Fax: _____
Email: _____
Organization: _____
Address: _____
City: _____ State: _____ Zip: _____

II. Source Description

A. Applicable standard

40 CFR Part 63, Subpart QQQQQQ – National Emission Standard for Hazardous Air Pollutants for Wood Preserving Area Sources

Compliance date:

- ☐ July 16, 2007 (for existing facilities constructed or reconstructed before April 4, 2007)
- ☐ July 16, 2007 (for new facilities constructed or reconstructed between April 4, 2007 and July 16, 2007)
- ☐ Upon startup (for new facilities constructed or reconstructed after July 16, 2007). Startup date: _____

B. Facility Description

Briefly describe the nature, size, design, and method of operation of your plant:

Wood Preservative used: _____

C. Process Type:

Types of emission points subject to standard types of Hazardous Air Pollutants (HAPs) emitted:

- ☐ Pressure Treatment Process using a wood preservative that contains chromium, arsenic, dioxins, or methylene chloride
- ☐ Thermal Treatment Process using a wood preservative that contains chromium, arsenic, dioxins, or methylene chloride
- ☐ Other Process: _____

D. Area/Major source determination (check the box that applies)

- ☐ My facility is a major source of HAPs
- ☐ My facility is an area source of HAPs

NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.

III. Certification

"This facility complies with the management practices to minimize air emissions from the preservative treatment of wood in accordance with § 63.11430."

Print name of responsible official: _____ Title: _____

Signature: _____ Date: _____

Send completed forms to : Mr. George Czerniak, Chief
Air Enforcement & Compliance Assurance Branch
EPA Region V
77 West Jackson Boulevard
Chicago, IL 60604

Additional information

§ 63.11430

- (a) If you use a **pressure treatment process** with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride at a new or existing area source, the preservative must be applied to the wood product inside a retort or similarly enclosed vessel.
- (b) If you use a **thermal treatment process** with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride at a new or existing area source, the preservative must be applied using process treatment tanks equipped with an air scavenging system to control emissions.
- (c) If you use **any** wood preservative containing chromium, arsenic, dioxins, or methylene chloride at a new or existing area source, you must prepare and operate according to a management practice plan to minimize air emissions from the preservative treatment of wood at a new or existing area source. You may use your standard operating procedures to meet the requirements for a management practice plan if it includes the minimum activities required for a management practice plan. The management practice plan must include, but is not limited to, the following activities:
 - (1) Minimize preservative usage;
 - (2) Maintain records on the type of treatment process and types and amounts of wood preservatives used at the facility;
 - (3) For the pressure treatment process, maintain charge records identifying pressure reading(s) inside the retorts (or similarly enclosed vessel);
 - (4) For the thermal treatment process, maintain records that the air scavenging system is in place and operated properly during the treatment process;
 - (5) Store treated wood product on drip pads or in a primary containment area to convey preservative drippage to a collection system until drippage has ceased;
 - (6) For the pressure treatment process, fully drain the retort to the extent practicable, prior to opening the retort door;
 - (7) Promptly collect any spills; and
 - (8) Perform relevant corrective actions or preventative measures in the event of a malfunction before resuming operations.

Definitions (§ 63.11433)

Air scavenging system means an air collection and control system that collects and removes vapors from a thermal treatment process vessel and vents the emissions to a vapor recovery tank that collects condensate from the vapors.

Chromated copper arsenate (CCA) means a chemical wood preservative consisting of mixtures of water-soluble chemicals containing metal oxides of chromium, copper, and arsenic. CCA is used in pressure treated wood to protect wood from rotting due to insects and microbial agents.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart, including but not limited to any emissions limitation or management practice;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emissions limitation or management practice in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Pressure treatment process means a wood treatment process involving an enclosed vessel, usually a retort, and the application of pneumatic or hydrostatic pressure to expedite the movement of preservative liquid into the wood.

Responsible official means responsible official as defined in 40 CFR 70.2.

Retort means an airtight pressure vessel, typically a long horizontal cylinder, used for the pressure impregnation of wood products with a liquid wood preservative.

Thermal treatment process means a non-pressurized wood treatment process where the wood is exposed to a heated preservative.

Wood preserving means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.