

AP42 Section:	6.8
Title:	Comments on January 1995 5 th edition
<p>Note: This material is related to a section in <i>AP42, Compilation of Air Pollutant Emission Factors, Volume I Stationary Point and Area Sources</i>. AP42 is located on the EPA web site at www.epa.gov/ttn/chief/ap42/</p> <p>The file name refers to the file number, the AP42 chapter and then the section. The file name "rel01_c01s02.pdf" would mean the file relates to AP42 chapter 1 section 2. The document may be out of date and related to a previous version of the section. The document has been saved for archival and historical purposes. The primary source should always be checked. If current related information is available, it will be posted on the AP42 webpage with the current version of the section.</p>	

The Soap and Detergent Association

March 29, 1993

Mr. Ronald Myers
Work Assignment Manager
United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Re: AP-42 Emission Factors

Dear Mr. Myers:

The Soap and Detergent Association (SDA) appreciates the opportunity to comment on the revised Compilation of Air Pollution Emission Factors: Volume I: Stationary Point and Area Sources, AP-42. SDA is a 139 member national trade association representing the interests of the formulators of soaps, detergents, and household cleaning products and the companies which supply ingredients for those products. SDA's members find the document to be generally satisfactory and agree with the conclusions that the previous emission factors are of the lowest applicable rating category. In addition, some of the general comments received were:

- The ratings tables are somewhat illogical and of little value. Specifically, rating the qualities of the emission data and the emission factors separately is illogical since the latter is derived from the former. The standards should be consistent with each other.
- Some of the emission data used is invalid, specifically "Rating D", and provides an opportunity for others to use this invalid data once the document has been published. The data should be withdrawn from the document.
- Emission factors rated "E" should not be included for the same reasons as above.
- More data points are needed. Good data are available from various state environmental protection agencies.

Additionally, one section of the report is in error. On page 10 it is stated that SDA was contacted by letter regarding this revision and that SDA did not respond. In fact, SDA initiated contact with the contractor by telephone at the request of some of SDA's member companies. SDA followed up with the contractor by telephone in both April and June, 1992, expressing concerns with the approach being taken in the study. The paragraph on page 10 should be revised to reflect these contacts by SDA.

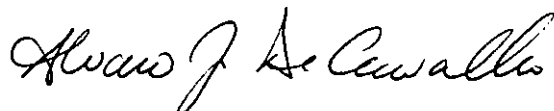
Mr. Ronald Myers
U.S. Environmental Protection Agency

March 29, 1993

2

In conclusion, the Soap and Detergent Association would like to thank you for the opportunity to comment on the document. If I can be of any further assistance, please contact me.

Sincerely

A handwritten signature in cursive script, reading "Alvaro J. DeCarvalho". The signature is fluid and written in dark ink.

Alvaro J. DeCarvalho
Assistant Technical Director

CHURCH & DWIGHT CO., INC.

469 NORTH HARRISON STREET
PHONE (609) 683-5900

PRINCETON, NJ 08543-5297
CABLE ADDRESS: CHURDWIGHT
TWX 710 480 9286

April 15, 1992

Mr. Ron Myers
Emission Inventory Branch (MD-14)
U.S. Environmental Protection Agency
Research Triangle Park, North Carolina 27711

Dear Mr. Myers:

In response to your request for Church & Dwight's assistance in updating AP-42, we find we cannot provide any help for the following reasons:

First, Church & Dwight's manufacture of soap and detergents is limited to a powdered laundry detergent. Although we also market other laundry products such as dryer softener sheets and liquid detergents, these products are produced for us by others.

Second, we do not utilize spray drying technology to produce our powdered detergent. Our process consists of a dry blending, agglomeration, and final conditioning (drying) steps. Emissions from these steps are limited to nuisance dust which is recovered using conventional dry dust collection system.

We regret not being of much assistance.

Sincerely,



Greg Suter
Director of Corporate Engineering
and Environmental Compliance

