

The file name refers to the reference number, the AP42 chapter and section. The file name "ref02_c01s02.pdf" would mean the reference is from AP42 chapter 1 section 2. The reference may be from a previous version of the section and no longer cited. The primary source should always be checked.

AP42 Section: 9.5.2

Background Chapter 2

Reference: 7

**Title: Written communication from J. M. Jaeckels, BT2, Inc., Madison, WI,
to D. Safriet, U. S. Environmental Protection Agency, Research
Triangle Park, NC,**

December 15, 1994.



Rec'd 12/16/94

AP-42 Section	9.5.2
Reference	7
Report Sect.	2
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Environmental Engineers, Hydrogeologists

December 15, 1994

Mr. Dallas Safriet
Environmental Engineer
United States Environmental Protection Agency
Emission Inventory Branch (MD-14)
Research Triangle Park, North Carolina 27711

SUBJECT: Emission Factor Documentation for AP-42 Section 9.5.2
Technical Comments & Confidentiality Issues

Dear Mr. Safriet:

As we discussed on the telephone Oscar Mayer Foods Corporation has some confidentiality concerns and technical comments on the EPA emission factor documentation report¹ which was recently sent to them for review. The following comments and confidentiality concerns are presented on behalf of Oscar Mayer Foods Corporation.

Section 1 Comments: No comments

Section 2 Comments:

To more accurately characterize the meat smokehouse industry the following comments should be considered:

- Page 5, second paragraph - The last sentence suggests liquid smoke is applied either through atomization or directly to the meat (assumed prior to loading in the smokehouse). Drenching, spraying, or dipping are other methods typically used. ✓
- Page 5 third paragraph - The fifth sentence states that "heat zones in continuous smokehouses may also be a source of small amounts of gaseous pollutants". The only reference for this section is the Air Pollution Engineering Manual. The section in this manual on meat smokehouses was reviewed and this statement was not found. The correct reference should be noted or this statement should be struck.
- Humidity could be added to the last sentence in this paragraph as a parameter affecting emissions. ✓
- Page 6, second paragraph - The middle of this paragraph presents vortex scrubber performance data and references Oscar Mayer correspondence to WDNR as the source of that data. This reference is wrong. Neither I or Oscar Mayer ever presented this information. ✓

¹USEPA, Emission Factor Documentation for AP-42 Section 9.5.2, Meat Smokehouses, Draft Report. EPA Contract No. 68-D2-0159 September, 1994.

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- Page 5 and 6 - Within the discussion of control technology two references to fabric filter baghouses are made. This would be a poor choice of controls for smokehouse exhausts. None are known to be in existence. This technology should not be suggested as a viable control technology due to the nature of the particulate (condensed organic matter). Vortex scrubbers are also mentioned. I believe this is taken from Hillshire Farm & Kahn's files. However, from what I know of this system it should not be recommended as a control option.

AP-42
does not
"recommend"
technologies.
Simply a
report of what's
used and how
well it works.

Section 3 Comments: No comments

Section 4 Comments:

Following the tables of data in this section (Tables 4-1, and 4-2) a discussion follows on how the final AP-42 numbers were arrived at. Some inconsistencies were found within this discussion. It is recommended that this discussion be reviewed carefully before publication. Some examples are:

- Page 23, third paragraph - Emission factors for uncontrolled filterable PM emissions from continuous smokehouses were developed from five A rated tests and 3 B-rated tests (not four A-rated and four B-rated tests as stated).
- Page 24, last paragraph - Emission factors for uncontrolled TOC from continuous smokehouses were developed from two A-rated, four B-rated, and two C-rated tests (not three A-rated and three B-rated tests as stated).

One B-rated
test was
changed to
A-rated.
3 A, 3 B, 2 C
(2 C not used)

Section 5 Comments:

Technical comments on this section are similar to those made in section 2.

- Page 9.5.2-4, first paragraph - The last sentence suggests liquid smoke is applied either through atomization or directly to the meat (assumed prior to loading in the smokehouse). Drenching, spraying, or dipping are other methods typically used.
- Page 9.5.2-4 second paragraph - The fifth sentence states that "heat zones in continuous smokehouses may also be a source of small amounts of gaseous pollutants". The only reference for this section is the Air Pollution Engineering Manual. The section in this manual on meat smokehouses was reviewed and this statement was not found. The correct reference should be noted or this statement should be struck.
- Humidity could be added to the last sentence in this paragraph as a parameter affecting emissions.
- Page 9.5.2-5, first paragraph - The middle of this paragraph discusses vortex scrubber performance data. This time Smoke in Food Processing is referenced as the source of data. Again, this reference is wrong as previously mentioned.
- Within the discussion of control technology a references to fabric filter baghouses and vortex scrubbers are made which again, would be poor choices of control.

Discuss
Electric
or
steam
heat

retained
vortex
wet
scrubber
discussion.

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Confidentiality Issues

With regard to the emissions data used from Oscar Mayer Foods Corporation, some of the supporting data and information raise two confidentiality issues. The first is the narrative discussion of continuous processes used at Oscar Mayer's Madison facility. The second is the production data presented in Appendix C. The combination of this information reveals the production capacity and operational data on the Madison plant—information which is typically closely guarded in the competitive food processing industry. Furthermore, the CWP's and CLSP are equipment developed by Oscar Mayer for their exclusive use. These pieces of equipment have been guarded for a many years and the production capacities have always been considered confidential. This equipment is unique to Oscar Mayer and is not used anywhere else in the meat industry. Its emissions do not reflect other equipment used in the industry. We are also addressing this confidentiality issue with the State of Wisconsin, where you obtained the information.

It is therefore recommended that confidentiality be acknowledged for Oscar Mayer by making the following changes to the report.

- Remove specific references to "Continuous Wiener Process No.1", "CWP-1", "No.9 Dry Sausage Smokehouse", "Continuous Large Sausage Process", "CLSP", "CWP-2", "CLWP" in sections 4.2.1.3 and 4.2.1.4. Generic use of the words "continuous" or "batch" smokehouses should be used instead. ✓
- Black out descriptions of smokehouses throughout stack test reports and tables in Appendix B and C. } will be done
- Remove March 21 letter to Bill Ansell from David Love from Appendix C and treat as confidential information. Discuss

I suggest that the confidential production data be used but not published in the public domain. If there are any procedures for declaring this data confidential, please let us know. If you have any questions regarding the contents of this response, please feel free to contact David Love, Oscar Mayer Foods Corporation (608-241-3311) or myself (608-277-2840).
Remove production data, but keep sawdust data

Sincerely,
BT², Inc.

Jeffrey M. Jaeckels for JMT

Jeffrey M. Jaeckels, P.E.
Senior Engineer