

AP42 Section: 9.8.3 Pickles, Sauces, and Salad Dressings

Title: Comments and correspondence to August 1995 supplement

Note: This material is related to a section in *AP42, Compilation of Air Pollutant Emission Factors, Volume I Stationary Point and Area Sources*. AP42 is located on the EPA web site at www.epa.gov/ttn/chief/ap42/

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"for those who think pickles"

PICKLE PACKERS



INTERNATIONAL, INC.

P.O. BOX 606

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PHONE: (708) 584-8950

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"One Pickle & Pepper Plaza"

January 29, 1993

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RICHARD HENTSCHEL

Secretary/Treasurer
FRAN KASS

Counsel:
RICHARD SILVERMAN
Hogan & Hartson
555 13th Street N.W.
Washington, D.C. 20004-1109

Ms. Margaret Thomas
MIDWEST RESEARCH INSTITUTE
425 Volker Blvd.
Kansas City, Missouri 64110

Dear Ms. Thomas:

Thank you for calling Pickle Packers International, Inc. and your interest in the pickle industry. I enjoyed our conversation.

Enclosed is the information you requested when we spoke on the 25th. Included is a flow chart on sauerkraut and a short description also.

The copy from the PPI Food Service Manual provides a "lighter" version of that from the CRC text.

I hope you find this information useful.

Respectfully yours,

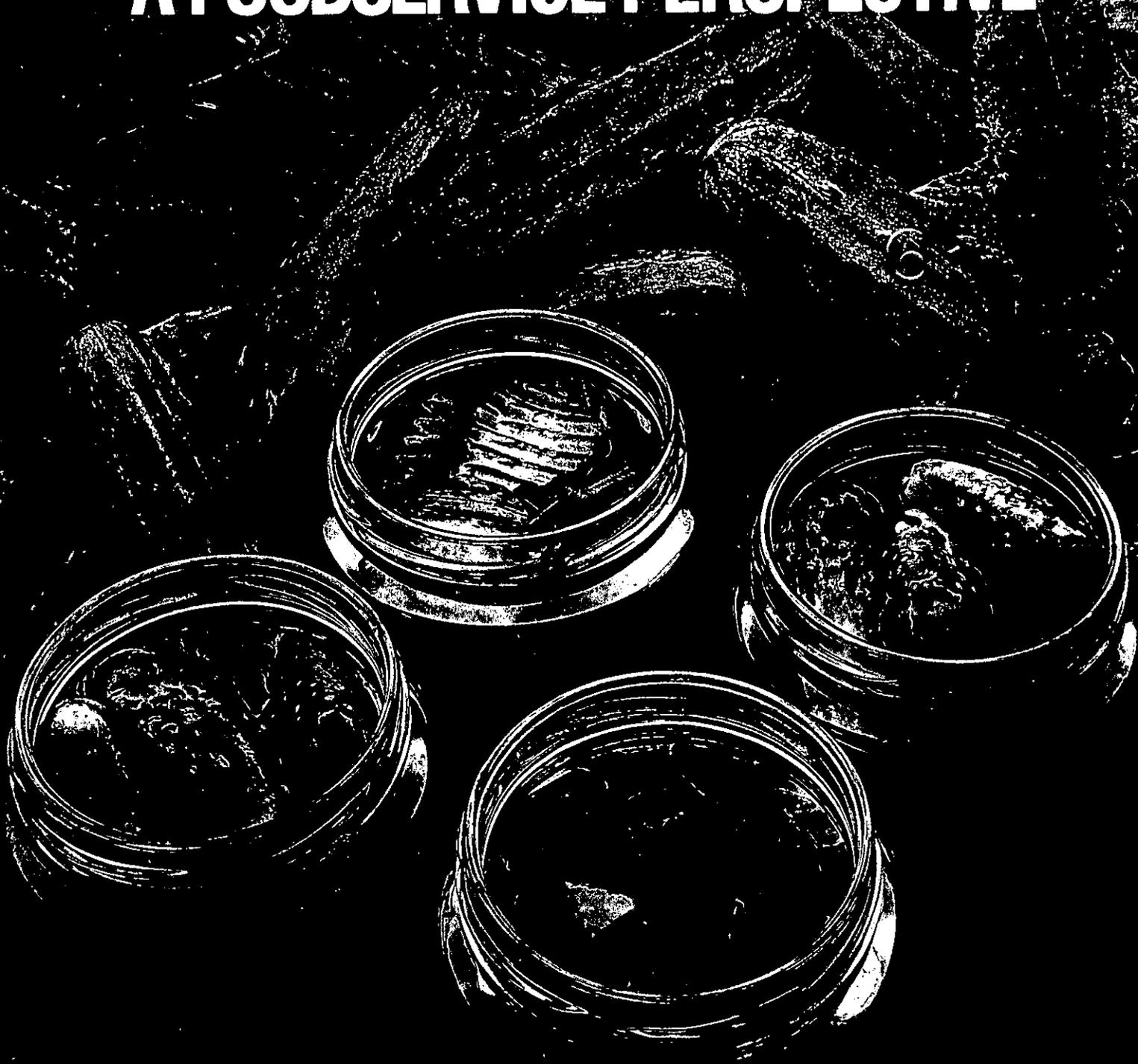
Richard Hentschel
Executive Vice President

RH:mh

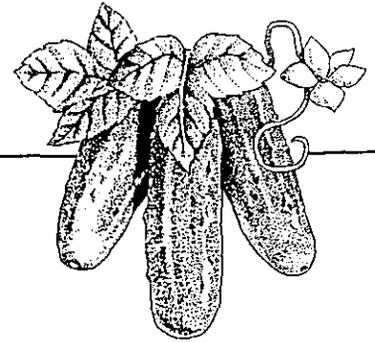
Encs.

P.S. The other materials are for your personal enjoyment!

PICKLES, PICKLES, PICKLES: A FOODSERVICE PERSPECTIVE



THE PICKLING PROCESS



Most pickles, including the varieties mentioned throughout this manual, are produced by one of three methods:

- **Fresh Pack:** Fresh-from-the-field cucumbers are cleaned and placed into containers, covered with a seasoned vinegar solution, vacuum sealed and quickly cooked and cooled. They have a very crisp texture and unique flavor. These pickles are available as: genuine dills, kosher (garlic-flavored) dills, chips, spears, halves, relish, sweet pickles, sweet and vegetable relish, mixed pickled vegetables and peppers. Fresh-pack pickles should be rotated every ten to twelve months, but have an 18 month shelf life.
- **Refrigerated:** Fresh, clean cucumbers are put into containers and covered with a seasoned solution that may, depending on the product, contain some vinegar or acidification, and are immediately refrigerated. The entire fermentation process takes place under refrigeration. Once the cucumbers have absorbed the seasonings, the pickles are then shipped and stored under refrigeration. They are very crisp, maintain their fresh cucumber color and have a highly seasoned taste. They are available as kosher dills, genuine dills, half-sour, overnight and sweet pickle varieties and come packed whole or in halves,

spears, slices, chips and relish. Refrigerated pickles have a fairly short shelf life. Stock should be rotated every four to six weeks, as there is only an 8 month shelf life on the retail products.

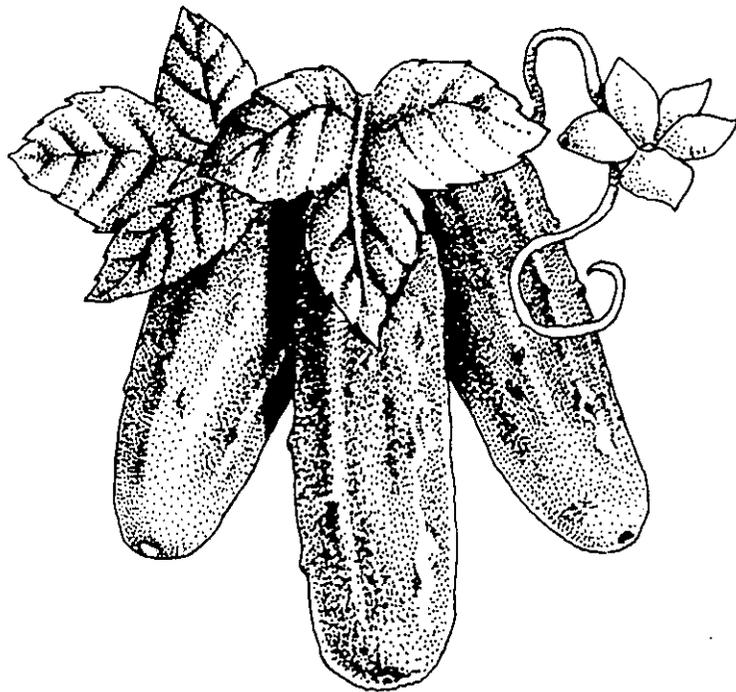
- **Processed:** Processed pickles are made from cucumbers placed in a solution of salt and spices in large tanks where they undergo full fermentation (sometimes called "curing" or "preserving"). This process can take from one to three months. Pickles are then removed from tanks, rinsed and put into containers with different additional seasonings to make various types of pickle products: kosher dills, genuine dills, sours and sweet pickles. These pickles have a sharper flavor and are available packed whole, in halves, spears, chips, relish, salad cubes and pepperoncini. Unopened processed pickle products—popular for buffets and as recipe ingredients—have a shelf life of 24 months.

PICKLE PARTICULARS

Availability: Pickles for institutional use are sold in gallon glass and plastic jars, No. 10 cans, 5-gallon metal drums, 5-gallon corrugated fiber drums with poly-liner, 2- and 5-gallon plastic pails and 15-gallon corrugated fiber drums with poly-liner.

Pack: Pickles are packed whole, halved and quartered and are available in spears, cubes, chunks, chips and relish. Pickled peppers are generally available whole and in rings. Low-salt versions of some pickle varieties are available.

Serving: Pickled products taste best when served chilled. Thoroughly refrigerate containers of pickles and pickled peppers before serving.



PICKLE PACKERS INTERNATIONAL, INC.

One Pickle and Pepper Plaza
P.O. Box 606
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THE ASSOCIATION FOR

**DRESSINGS
& SAUCES** ¹⁵⁰⁷

SUITE 500-G • 5775 PEACHTREE-DUNWOODY ROAD • ATLANTA, GEORGIA 30342 • TELEPHONE 404/252-3663 • FAX 404/252-0774

February 1, 1993

Ms. Margaret Thomas
Midwest Research
425 Volker Blvd.
Kansas City, Missouri 64110

Dear Ms. Thomas:

I have enclosed some information concerning the processing, dehydration and canning of vegetables and fruits. This information is an excerpt from Elements of Food Technology, edited by Norman W. Desrosier, published by AVI. I am not sure that this information can be condensed to two pages per question.

Another reference you may want to use is a book entitled A Complete Course in Canning and Related Processes, Book 1 (Basic Information on Canning, 12th ed.). The book was edited by Anthony Lopez and published by Canning Trade Inc., 2619 Maryland Ave., Baltimore, MD 21218-4576.

I hope this information is helpful. If you have any other questions or if I can be of assistance in any way, please do not hesitate to call.

Sincerely,

Pam Anderson
Director of Technical Services

PA/pc

Enclosures

Chumley

*sent 4 +
unbound
copy*

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Rec'd 3/28/95
TL



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March 13, 1995

Mr. Dallas W. Safriet
Environmental Engineer
Emission Inventory Branch
United States Environmental Protection Agency
Emission Factor and Inventory Group (MD-14)
Research Triangle Park, NC 27711

Re: Emission Factor Documentation for AP-42
Section 9.8.3
Pickles, Sauces, and Salad Dressings
EPA Contract No. 68-D2-0159
Work Assignment No. II-03
MRI Project No. 4602-03

Dear Mr. Safriet:

The Association for Dressings and Sauces ("ADS") is the national trade association for manufacturers of dressings for salads, including mayonnaise and condiment sauces, and their suppliers. Our more than 65 manufacturing members include producers of major branded products, private label manufacturers, and small firms that compete regionally with branded and private label products in both retail and foodservice markets.

ADS welcomes the opportunity to comment on the EPA's draft report on pickles, sauces and salad dressings to be included in a supplement to AP-42, Compilation of Air Pollutant Emission Factors.

ADS has no comments regarding the "Emissions" and "Emission Control Technology" sections of the draft due to the lack of emissions data with respect to our industry. However, we would like to offer the following comments regarding the "Industry Characterization" and "Process Description" sections offered in the draft.

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2.1 Industry Characterization

The draft indicates that "salad dressings are generally considered to be products added to and eaten with vegetables, fruit, meat, fish and seafood salads." We would like to note that mayonnaise and spoonable (semisolid) salad dressing are also eaten as sandwich spreads in many cases.

2.2.3 Salad Dressings

We would like to suggest that the first sentence under this section be modified to read "Salad dressings (except products modified in calories, fat or cholesterol) are typically made up of oil, vinegar, spices and other food ingredients to develop the desired taste." The draft lists "eggs" as a typical ingredient which is not the case in many dressing products.

With respect to the classifications of salad dressings, there are U.S. standards of identity for three types of dressings -- mayonnaise, spoonable (semisolid) salad dressing and french dressing. All other dressings are non-standardized and are typically referred to as "pourable".

Mayonnaise

Mayonnaise is regulated by a U.S. FDA Standard of Identity which requires that the oil content be not less than 65% (by weight). Acidifying ingredients (vinegar, lemon juice, lime juice) and egg yolk containing ingredients are also required by the standard. Mayonnaise is allowed to contain optional ingredients other than the "seasonings" listed in the draft (i.e., citric acid, malic acid, crystallization inhibitors and sequestrants to preserve color and flavor).

Salad Dressing

"Semisolid" salad dressing is referred to in the industry as "spoonable" to differentiate it from pourable dressings. This product is regulated by an FDA Standard of Identity and must contain not less than 30% oil (by weight). We would like to emphasize that salad dressing is not mayonnaise mixed with a starch paste. A starch paste and the other ingredients besides oil are blended and then oil is slowly added to form a "pre-emulsion". When half of the oil is incorporated, the remainder of the starch paste is added at the same rate as the oil. When all the starch and oil have been added, the mixture continues to blend and is then milled. Emulsifiers are not allowed in the Standard of Identity for salad dressing. Optional ingredients which are allowed include salt; nutritive carbohydrate sweeteners; any spice (except saffron or tumeric) or natural flavoring; monosodium glutamate; stabilizers and thickeners; citric and/or malic acid; sequestrants and crystallization inhibitors.

Liquid Dressings

The Liquid dressing section of the draft indicates that pourable products may contain no less than 35% (by weight) vegetable oil and no more than .75% (by weight) emulsifiers. Only one liquid (pourable) dressing has a Standard of Identity -- French dressing. There is no provision for emulsifiers in the French dressing standard. All other pourable dressings are non-standardized and therefore have no specific requirements with respect to ingredients, including oil and egg content.

Respectfully submitted,

A handwritten signature in cursive script that reads "Pam. Chumley" with a small "w" or flourish underneath.

Pamela A. Chumley
Technical Director

cc: Ed Campbell

Rec'd 2/17/95
R

HOGAN & HARTSON

L.L.P.

COLUMBIA SQUARE
555 THIRTEENTH STREET NW
WASHINGTON DC 20004-1109

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February 14, 1995

RICHARD S. SILVERMAN
PARTNER
DIRECT DIAL (202) 637-5581

BY FEDERAL EXPRESS

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

**Re: Emission Factor Documentation for AP-42, Section 9.8.3,
Pickles, Sauces, and Salad Dressings – Draft Report**

Dear Mr. Safriet:

I am writing on behalf of our client Pickle Packers International, Inc. (PPI) to comment on the draft report on pickles, sauces, and salad dressings for AP-42. PPI, the trade association for the pickle and sauerkraut industry, appreciates the opportunity to comment on the draft report. PPI membership includes over 65 companies in 14 countries. Its members produce approximately 90 percent of the pickles manufactured in the United States.

1. Emissions

PPI recommends that the draft report be revised to convey more clearly the complete absence of any quantitative data concerning emissions from pickle and sauerkraut manufacturing facilities. As drafted, the report concedes that no such data exist and, accordingly, does not establish specific emission factors for the industry. Nevertheless, the qualitative discussion of potential emission sources implies that emissions, particularly of volatile organic compounds (VOC) and particulate matter (PM), are significant. Several considerations suggest that this representation is unwarranted.

First, the report cites no data or literature which indicates that pickle and sauerkraut manufacturers are significant emission sources. Second, the report states that VOC emissions are "most usually associated" with the "cooking and evaporative concentration" steps in thermal processing. Pickle manufacturing, however, does not involve "concentration." Moreover, any cooking that occurs is

Dallas W. Safriet
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done in hermetically sealed containers, as the report itself notes, severely limiting the possibility of any emissions. Third, any PM emissions, which the draft report speculates would come "mainly from solids handling, solids size reduction, and cooking," would consist of organic, biodegradable food particles rather than inorganic, non-degradable hazards (e.g., rock dust; asbestos). 1/

If the draft report is published in its current form, state officials may overestimate the level of emissions from industry facilities and, as a result, insist on costly testing and monitoring procedures. Delays in approving new plant permits could also occur. In the absence of any quantitative data on emissions, imposing such costs on the industry would have little, if any, justification. PPI, therefore, strongly urges EPA to revise the draft report to state explicitly that the agency has no data that indicate a significant level of emissions of any kind from the pickle and sauerkraut industry. In addition, the qualitative discussion of PM and VOC emissions should be deleted or rewritten to avoid any tendency to overstate the potential for emissions, either implicitly or explicitly.

2. Emission Control Technology

The draft report's discussion of emission control technologies could have a similar misleading effect on state regulators. The report, as drafted, implies that advanced add-on controls, including condensers, absorbers, incinerators, and scrubbers, are easily applied to emission sources in the industry. Thus, state regulators are likely to expect industry facilities to have these add-on controls.

However, the report fails to address several key issues in this regard, namely whether such controls are appropriate to the industry, whether they have been used effectively by industry, and whether they would be cost effective. Without a thorough, industry-specific investigation of these issues, the draft

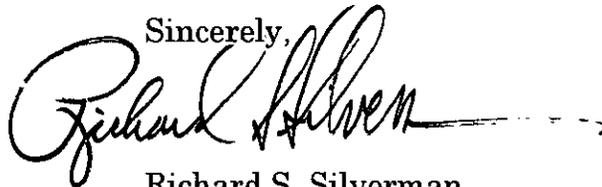
1/ PPI also questions whether a discussion of potential VOCs from "[g]lue used in the labeling process" is appropriate in a report designed to address emissions in a specific industry. Emissions from glue and other sources in the labeling and packaging process are common to many industry segments, including a large portion of the food industry. PPI believes such emissions are better addressed in a report that addresses general aspects of manufacture and production.

Dallas W. Safriet
February 14, 1995
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report's discussion of emission control technologies and their "availability" to the industry is meaningless. PPI, therefore, strongly recommends that this section of the draft report be revised to assess the issues discussed above and to reflect the negligible level of emissions associated with the pickle and sauerkraut manufacturing industry.

PPI thanks EPA for the opportunity to comment on this draft report and for its consideration of PPI's views. Further, PPI believes it would be beneficial for the agency to meet with PPI representatives to discuss more fully the issues outlined in this comment. I will contact you in the near future to arrange a mutually agreeable meeting time. If you have any questions in the meantime, or require further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard S. Silverman", with a horizontal line extending to the right from the end of the signature.

Richard S. Silverman

General Counsel to Pickle Packers
International, Inc.