

Note: This is a reference cited in *AP 42, 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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Background Report Reference

AP-42 Section Number: 9.9.1

Background Report Section: 4

Reference Number: 55

**Title: Letter from Brian L. Bursiek,
Americana Feed Industry Association
To Dallas Safriet, US EPA
October 23, 1995**

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AMERICAN FEED INDUSTRY ASSOCIATION

AP-42 Section 9.9.1
Reference
Report Sect. 4
Reference 55

October 23, 1995

Dallas Safriet
Emissions Inventory Branch (MD-14)
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

RE: GRAIN ELEVATOR AND GRAIN PROCESSING PLANTS, EMISSION FACTOR DOCUMENTATION FOR AP-42

Dear Mr. Safriet:

The American Feed Industry Assn. (AFIA) appreciates the opportunity to submit the enclosed emission test results from seven studies conducted at three locations on pelleting, grinding, and roller mill systems. As we discussed on the phone, the next release of AP-42 is fast approaching. AFIA hopes EPA will be able to incorporate the enclosed data improving the AP-42 data with regards to these systems.

The first two sets of data; Wayne Farms, Laurel, Mississippi, and Wayne Farms, Sandersville, Mississippi, are two studies both conducted at the same location. It has been referred to by two different city addresses. In both cases, the 1992 and 1994 testing was conducted on the same equipment -- discharges from the pelleting system with triple cyclones and from the grinding system with a baghouse. To summarize:

<u>Year</u>	<u>System</u>	<u>Lbs/Hour</u>	<u>Tons/Hour</u>	<u>Emission - Lbs/Ton</u>
1992	Grinding	0.07	28.0	0.0025
		0.04	28.0	0.0014
		0.13	28.0	0.0046
	Pelleting	8.37	50.0	0.167
		5.73	50.0	0.115
		8.40	50.0	0.168
1994	Grinding	0.04	28.0	0.0014
		0.02	28.0	0.0007
		0.05	28.0	0.0018
	Pelleting	4.10	50.0	0.082
		7.27	50.0	0.145
		3.62	50.0	0.072

The data looks real good, and because sampled at the same mill on two separate occasions, brings validity through repeatability. If you have any questions regarding these tests, please contact: Jim Freiss, P.E., Assist. Director Environmental Affairs, Continental Grain Company, Ph: 404/564-4061.

The third set of data was obtained at Stockton Hay and Grain Co., Stockton, CA, and represents a roller mill and two pelleting systems, each with a single cyclone. To recap:

<u>Year</u>	<u>System</u>	<u>Lbs/Hour</u>	<u>Tons/Hour</u>	<u>Emission - Lbs/Ton</u>
1983	Roller Mill	1.88	6.0	0.313
		1.69	6.0	0.282
		1.20	13.0	0.092
	Pelleting #1	3.77	26.0	0.145
		1.73	16.0	0.108
		1.99	16.0	0.124
	Pelleting #2	2.70	10.0	0.270
		2.08	10.0	0.208
		2.31	10.0	0.231

If you have any questions regarding these tests, please contact: E.H. Gallagher, Branch Manager, Environmental Research Group, Ph: 415/652-2300.

I hope this material can be reviewed and incorporated into the next draft of AP-42. I understand you are under tight time commitments. However, AFIA believes the proposed emission factor of 0.46 Lbs/Ton in the May 1994 draft is still too high a value. If the above pelleting factors were averaged, this new data represents a mean value of 0.153 Lbs/Ton. This is in-line with what AFIA believes to be appropriate and representative for feed mill pelleting systems.

I am interested in hearing your thoughts once you have had time to review this information. I will give you a call within the next couple of days.

Sincerely,



Brian L. Bursiek
Director, Feed Production
AFIA

Enclosures