

<b>AP42 Section:</b>	<b>10.7</b>
<b>Related:</b>	<b>1</b>
<b>Title:</b>	<b>Letters and comments to Sept. 1995 section.</b>
<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 <a href="http://www.epa.gov/ttn/chief/ap42/">www.epa.gov/ttn/chief/ap42/</a></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 The document may be out of date and related to a previous version of the section.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>	



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Date: June 20, 1995

Subject: Charcoal  
Review and Update of Wood Products Industry Sections  
of Chapter 10, AP-42  
EPA Contract 68-D2-0159, Work Assignment I-10  
MRI Project 4601-10

From: Richard Marinshaw

To: Dallas Safriet  
EPA/EIB/EFMS (MD-14)  
U. S. Environmental Protection Agency  
Research Triangle Park, N.C. 27711

Enclosed is a copy of the revised (final) draft background report and AP-42 section for charcoal. For the most part, this draft is based on the same references as the previous draft. However, included in the background file, which you provided us last fall, was a complete set of references and the background report prepared by PES for the 1983 version of the AP-42 section. As a result, we were able to reevaluate all of the data that formed the basis for the previous AP-42 section, and we have made several changes to the report. The changes to the AP-42 section are summarized in Section 4.4 of the background report. In addition to those changes, please note the following:

- In the background report, we have described the report by Shell Engineering (Reference 10 in Section 4 of the background report) that presents an estimated emission factor for the entire briquetting process. During our last meeting, you mentioned that there may be a problem of confidentiality with that report. Please let me know if we should delete that reference from the background report.
- The section currently is titled, "Charcoal." It might be more consistent with AP-42 to title the section "Charcoal Production" or "Charcoal Manufacturing."



11 February 1994

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

Dear Mr. Safriet,

The Barbecue Industry Association (BIA) appreciates the opportunity to review and comment on the draft version of Section 10.7, Charcoal Manufacturing that EPA is proposing to publish in a Supplement to AP-42.

In general, the information included in the draft for uncontrolled kilns is acceptable. The draft, as written does not adequately describe the majority of the charcoal industry today. The proposed write-up reflects emissions from uncontrolled kilns that characterized much of this industry in the past. Significant technological advances have been made in recent years throughout the industry and today uncontrolled kilns - that still exist in Missouri only - represent the exception rather than the norm in environmental performance for our industry. These advancements have enabled the industry to be much more environmentally responsible than the environmental performance achieved by uncontrolled kilns.

Today, for example, depending on site specific operations, the use of cyclones and afterburners on multiple hearth furnace systems is quite common to recover product and heat. They secondarily provide significant air pollution control benefits. These controlled continuous operations routinely provide greater than a 10 fold improvement in emissions as compared to uncontrolled kilns. Permits for some of these type facilities, requiring even greater than a 10 fold emission reduction, are in place today in the charcoal industry. Similar improvements have been made with kilns through the use of incineration systems.

Barbecue Industry Association

710 E. Ogden, Suite 113 • Naperville, Illinois 60563 • 708/369-2404 • Fax: 708/369-2488

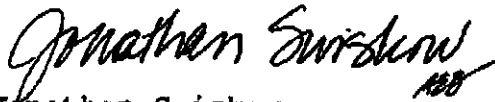
CHARCOAL • GRILLS • LIGHTERS • UTENSILS • SUPPLIERS • FOOD

Mr. Dallas Safriet  
February 11, 1994  
Page Two

The BIA would like to extend an offer to propose a draft rewrite of this section of AP-42 for EPA to include additional information on charcoal production systems that exist today. On general, the information included in the draft for uncontrolled kilns is acceptable.

We await your reply.

Sincerely yours,

A handwritten signature in cursive script that reads "Jonathan Swiskow". The signature is written in dark ink and includes a stylized flourish at the end.

Jonathan Swiskow  
Chairman, Charcoal SIG, BIA

## BARBECUE INDUSTRY ASSOCIATION

Urgent \_\_\_\_\_ Routine XDate 2/17/94To: Dallas SatrietCompany/Department: EPAFax Number: 919/541-0684From: Aun Spehar

Subject: \_\_\_\_\_

Total number of pages including this page: 3

## Message:

Mr. Satriet  
Per your request here is  
letter we discussed. Thank you.  
A. Spehar

If you do not receive all pages, or if any portion of the transmission is illegible, please call: 708/369-2404. Our fax number is 708/369-2488.

BIA BIA BIA BIA  
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17  
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