AP-42 Section 10.8
Reference 3
Report Sect. 2
Reference 2

Rick Marinshaw

From: George Parris [gparris@awpi.org]
Sent: Thursday, September 17, 1998 4:16 PM
To: 'rmarinshaw@mriresearch.org'
Subject: More preliminary comments on AP-42 see Attached Excel File


Comments On AP42.xls

Again, in the interest of time, I am sending you comments from one of our members. We expect more comments but they may not be ready until Monday (21 September 1998).

George Parris/ American Wood Preservers Institute

From: Bock, Nick[SMTP:NBOCK@KMG.com]
Sent: Thursday, September 17, 1998 2:51 PM
To: 'gparris@awpi.org'
Subject: Attached Excel File

<<Comments On AP42.xls>>

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Emission Factor Documentation For AP-42
Section 10.8
MRI Project No. 4945
September 1, 1998

Comments

Page	Section	Paragraph	Line	Comment	Comment Priority
1	2		1	1 Bacteria should be included in sentence	Medium
1	2		1	2 Service life extended by a factor of 5x-10x	Low
1	2.1				
Table 2-4				The figures of crosstie treated and gallons	High
Table 2-4				of creosote used just don't track 74.124 cuft/yr X 8# creo/cuft X gal/9# creo =65 mill gal creo/yr Adding switch and bridge brings it to 74 million gallons/yr Table 2-4 reports 94 million gallons per year. The Problem: 20 million gallons per year. It certainly is not in poles and piling What's wrong with the numbers?	
2	2.2.1		1	1	
		Creosote Solutions			
2	2.2.1		1	2 Less penetration of Petroleum creosote solution is as good if	High
		Creosote Solutions		not better than creosote. We believe solution is less viscous	
2	2.2.1		1	3 The same treatment is the same for solution and creosote	High
		Creosote Solutions		The results are also the same. May be talking about coal tar which is no longer used in our industry	
2	2.2.1		2	1 Certain species will rot before air drying: very misleading	
		Conditioning		Customer specification eliminate these species and	Medium
				german stack prevents this rot.	
5	2.3	Top of Page		1 White emisison plumes? Steam not emissions	High
				Several Hours? No way	High
				We control our naphthalene content to minimize emissions	
5	2.4		1	Last Small hoods over doors are not economical	
				Large hood over drip pads would require capital expenditures exceeding the value of total plant property and equipment!	
5	2.4		2	Whole At Avoca our limited data suggested that water quenching in the	High
6	2.4			Whole cylinder actually increased emissions. I am not sure if his reference	
				is Avoca. We eliminated quenching at Avoca for this reason. This was a result of the inability to provide a clean water supply.	
6	2.4		1	Incinerator We closed Avoca as a direct result of high opening costs per	Highest
				unit volume wood treated. A major consideration was the $80K it cost to run the incinerator. I know of no operating incinerator In our industry.	
6	2.4	last	last	Afterburners are in the same category as incinerators	Highest
16	Table 2-6		Table 2-6	The chemical constituents in this table are inconsistent with	
				values used in Title V work for creosote. -Gerg Data However we better leave this alone.	
2	4.2.1.2		Ref 11	Keep in mind that this incinerator is no longer operating and	
				no plan have been made for any incinerator.	