



American Wood Preservers Institute

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AP-42 Section 10.8
Reference 6
Report Sect. 2
Reference 5

January 10, 1997

Dallas Safriet
Emission Factor and Inventory Group (MD-14)
Emissions, Monitoring, and Analysis Division
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Subject: Comments on AP-42

In January 1997, Mr. Richard Marinshaw of Midwest Research Institute contacted me to inquire if AWPI had any additional comments on AP-42 Section 10.8 (Draft June 1996). In August 1996, AWPI provided you with a copy of our latest "Statistical Report" (1995) and a copy of a document by AquAeTer "Calculated Emissions from Creosote-Treated Wood Products."

We have recently circulated the full text of your draft document to about 50 of our members and have received the following comments in addition to the material that we already sent to you:

page 2-6, line 19: where you say "mineral spirits" the solvents are mainly "petroleum carriers."

, line 22: replace "I," "II," and "III" with "A," "B," and "C"

page 2-7, line 10: currently vapor drying is rarely if ever used

suggest you add kiln drying see "EPA RCRA Compliance Guide" (EPA-305-B-96-001) June 1996, section 2-4

page 2-8, line 6-7: waterborne treaters mainly use the "modified full cell"

, line 20-21: wood treated by the "Boulton" process is generally not considered to be treated by the "full cell" process

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/

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.



page 2-10, line 3: change "always" to "most likely"

page 2-12, line 25: insert "Oilborne" before "wood treatment plants..."

, line 27: insert "potential" in front of "source of VOC and HAP emissions.

There are aspects of the accuracy and completeness of the document that only the authors who compiled the data can be responsible for. Although these are the only comments we have at this time, our comments are not to be taken as an endorsement of the document.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene S. Bartlow".

Gene S. Bartlow, CAE
President & CEO
American Wood Preservers Institute

CC: Government Affairs Committee