

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/](http://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 maybe from a previous version of the section and no longer cited. The primary source should always be checked.

September 7, 1999

Mr. Ronald Ryan  
U.S. Environmental Protection Agency  
Emissions, Monitoring and Analysis Division  
Emission Factors & Inventory Group  
(MD-14)  
Research Triangle Park, NC 27711

Re: Draft AP42 - Rubber Manufacturing Industry  
(1) Data Review Update  
(2) Tire Carcass Grinding Update

Dear Ron:

First, I want to thank you for taking the time to review the files from the RMA Emission Factor Study at TRC Corporation in June 1999. I hope the meeting gave you a greater comfort level with the RMA project, and will facilitate finalization of the AP-42 section for rubber processing. Enclosed you will find a letter from Mark Gollands at TRC, which answers the outstanding question we had about treatment of volatiles results that were detected by more than one analytical approach. I can be of further help, please call.

#### Tire Carcass Grinding Update

As I described in my January 12, 1999 letter, Michelin North America recently conducted additional emissions testing on tire grinding operations to update the emission factors for toluene and methylene chloride. As anticipated, the results showed the emissions of methylene chloride and toluene to be much lower than previously reported in the RMA Emission Factor Study. This data supports RMA's view that the original data were the result of laboratory contamination. Enclosed for your review is the sampling report from Trigon Engineering, which details the Michelin testing.

Accordingly, the EPA AP-42 emission factors carcass grinding operations for methylene chloride and toluene should be revised immediately as follows:

Methylene Chloride revised emission factor: 2.5E-07 lb emission/lb rubber removed

Toluene revised emission factor: 6.3E-06 lb emission/lb rubber removed

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Also, you and I had discussed the tire carcass grinding data currently reflected in AP-42. Since our discussion, I have been able to verify that all of the data currently in AP-42 does correspond to the cyclone inlet data. The Volume 2 factors (average inlet factors) that are not consistent with the present AP-42 factors are a result of the L/2 method that RMA eventually used to treat the non-detects for averaging purposes. This modification is consistent with the treatment of averaging in all emission factors across the various manufacturing processes tested. RMA members currently are considering whether inlet or outlet concentrations are more appropriate representations in this situation, and I expect to discuss this with you further in the coming weeks.

I look forward to receiving your draft AP-42 section narrative for our review. Finalization of the AP-42 section for the rubber processing industry is of paramount importance to RMA's members. The emission factors are indispensable tools used for many permitting and reporting purposes nationwide. Likewise, I am interested to see the factors in Excel format available on the Internet. This format will allow for easier and more efficient use of the factors. If you have any questions or need additional information, please contact me at (202)682-4839 (phone), (202)682-4854 (fax) or [tracey@rma.org](mailto:tracey@rma.org) (e-mail).

Sincerely,

Tracey J. Norberg  
Director, Environmental Affairs

Enclosures