

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.

AP-42 Section Number: 9.9.4

Reference Number: 5

Title: Telephone conversation with D. Burkholder, Shofstall Alfalfa, and T. Lap and T. Campbell, Midwest Research Institute, Clarification of alfalfa dehydration process

Burkholder, D.

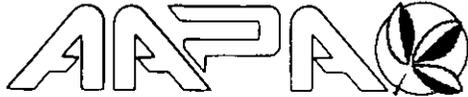
Shofstall Alfalfa

June 1995

American Alfalfa Processors Association

9948 West 87th Street, Suite E
Overland Park, Kansas 66212
Telephone 913-648-6800

AP-42 Section 9.9.4
Reference 5
Report Sect. _____
Reference _____



July 3, 1995

Mr. Thomas F. Campbell
Environmental Engineer
MRI
Suite 350
401 Harrison Oaks Boulevard
Cary, NC 27513-2412

Dear Mr. Campbell:

Enclosed is a corrected copy of the telephone report with Mr. David Burkholder regarding AP-42 data.

If you need additional information, please feel free to contact our office.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Wanda L. Cobb'.

Wanda L. Cobb
Executive Vice President

enc

CONTACT REPORT

Contact: David Burkholder
Shofstall Alfalfa
(308) 784-2115

Contacted by: Tom Lapp, Tom Campbell
Midwest Research Institute

Date: June 13, 1995

Re: Clarification of alfalfa dehydration process

The purpose of the call was to find out at what point in the dehydration process were samples taken in the four source tests MRI received from the American Alfalfa Processors Association. Mr. Burkholder said that all samples were taken from the duct leading out of the primary cyclone following the dryer drum. Emission factors developed from these tests would therefore replace the current (Section 6.1, Fourth Edition) emission factor for primary cyclone.

We also asked Mr. Burkholder to explain why he thought the other emission factors (those for pellet cooler cyclone, meal collector cyclone, and pellet regrind cyclone) given in the current AP-42 (Section 6.1, Fourth Edition) were inaccurate. He explained that the alfalfa process has changed significantly since those factors were first developed in the mid-70's. The emission factor for the pellet cooler applied to vertical coolers that were used at that time. Currently, most dehydrators use horizontal coolers that have much lower flow rates (which, in Mr. Burkholder's opinion, would lead to lower emission rates). Mr. Burkholder said that the meal collector cyclone has been replaced with a meal collector bag filter, and although he did not have any emissions data, he said that bag filter manufacturers guarantee a particulate removal rate that is lower than the current AP-42 allows for. Mr. Burkholder also said that there is no longer a pellet regrind operation used in alfalfa dehydration.

Bag filter added to the system after the meal cyclone

However, while Mr. Burkholder's assertions may be true, there are no test data to support his claims. Currently, MRI is contacting manufacturers of bag filters for the meal collector to see if there are any test data available.

Wrong. We still regrind pellets. No one I know uses an air conveyance system to elevate the reground pellets. We use elevator legs which result in no visible emissions from the regrind process. Nebraska D.E.Q. asked me to test this system, but since there is no air discharge stream to sample, we could not figure out any way to test the system.

David Burkholder



MIDWEST RESEARCH INSTITUTE

Suite 350

401 Harrison Oaks Boulevard

Cary, North Carolina 27513-2412

Telephone (919) 677-0249

FAX (919) 677-0065

June 19, 1995

Wanda L. Cobb
Executive Vice President
American Alfalfa Processors Association
9948 West 87th Street, Suite E
Overland Park, Kansas 66212

Dear Ms. Cobb:

Enclosed are two copies of information provided by Mr. David Burkholder on June 13, 1995, regarding the alfalfa dehydration process. Please forward this contact report (along with a copy of this letter) to Mr. Burkholder, as I do not have his address on file.

To ensure the accuracy of data that may be used in the development AP-42 sections, the U. S. Environmental Protection Agency requires that all information contained in telephone reports be confirmed. Please have Mr. Burkholder review the enclosed report and make any necessary changes to make the report accurate and complete. He is to sign and date one copy and return it to me. The second copy is for his records. A final version of the report, incorporating any changes that he requests, will be placed in the files of support information for this project. If we have not received a response from Mr. Burkholder by July 10, 1995, the report will be considered final and will be placed in the project files which will be made available to be public.

Thank you for passing this report on to Mr. Burkholder and please thank Mr. Burkholder for reviewing this report. If you or Mr. Burkholder have any questions, please call me at (919) 677-0249, ext. 5230.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Campbell".

Thomas F. Campbell
Environmental Engineer

Enclosure

CONTACT REPORT

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Shofstall Alfalfa
(308) 784-2115

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Date: June 13, 1995

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