

AP42 Section:	10.5
Reference:	11
Title:	Written communication from John Pinkerton, National Council of the Paper Industry for Air and Stream Improvement, Inc., to Dallas Safriet, U. S. Environmental Protection Agency, Research Triangle Park, NC, June 8, 1993. 2002 supplement

NATIONAL COUNCIL OF THE PAPER INDUSTRY FOR AIR AND STREAM IMPROVEMENT, INC.
260 MADISON AVE. NEW YORK, N.Y. 10016 (212) 532-9000 FAX: (212) 779-2849

116

June 8, 1993

Dr. John E. Pinkerton
Program Director
Air Quality
(212) 532-9047

Mr. Dallas Safriet (MD-13)
Emission Inventory Branch
Emission Standards and Engineering Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Dallas:

Re: May, 1993 Draft Revision of AP-42 Section 10.5,
"Plywood Manufacturing"

Thank you for providing a revised draft of the subject AP-42 section for review. We were gratified to see that most of our April 13, 1993 comments and suggestions had been incorporated into this latest draft. We would like to reiterate a few of our previous comments which were not addressed in this latest draft of the documentation report, as well as provide a few suggestions on the revised AP-42 section. Our comments are provided below by page number.

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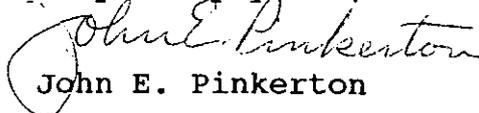
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We appreciate the opportunity to provide EPA with these review comments and hope that they will be carefully considered in preparing the final section on plywood manufacturing for inclusion in Appendix F of AP-42. Please contact either me or Dr. David Word at our Southern Regional Center (telephone 904-377-4708, ext. 241) if you need to clarify any of the above comments or suggestions. We look forward to receiving the final version of this material as soon as it is ready.

Very truly yours,


John E. Pinkerton

cc: V. Dallons
D. Mumper
J. Emery
G. Andrew
A. Caron
D. Word

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Handwritten notes:
method 301 validation - not for press vents
method 18 validation - not for veneer dryers

ADD)
THESE
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(NCASS.)

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June 28, 1993

Mr. Dallas W. Safriet (MD-14)
Emission Factor and Methodologies Section
Emission Inventory Branch
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Dallas:

RE: Wood Products Industry Emission Testing Priorities

As you requested during the meeting with industry representatives on May 27, the National Council staff has reviewed the April 1, 1993 MRI draft memorandum outlining emission testing priorities for wood products industry sources for the purposes of improving AP-42 Chapter 10 emission factors.

Although many comments and suggestions could be offered on the methodology by which MRI developed the priorities, we think it would be most productive to focus on identification of the most significant emissions information needs facing the forest products industry. Since we are not familiar with the charcoal and wood preserving segments of the industry, our suggestions for testing priorities will focus on pulp and paper mills, panel plants, and lumber mills.

In our view, the most critical data gap facing the industry is for fugitive VOC emissions from wood material storage piles. Pulp mills, panel plants, sawmills and chipping facilities would benefit from having estimates for VOC emissions. Currently there are no factors for emissions from chip, sawdust or bark piles. Particulate and PM₁₀ emissions from the storage piles and transfer activities should also be of high priority. MRI has only suggested that a wind tunnel investigation be conducted; we feel FTIR technology merits consideration for full-scale speciated VOC measurements on actual piles. Quantification of terpenes and isoprenes is of critical importance.

For pulp and paper mills, we agree that high priority should be assigned to obtaining speciated VOC emissions information for mechanical pulping processes (mistakenly identified as chemical pulping processes in the MRI memorandum) such as stone groundwood, thermo-mechanical, and chemi-thermomechanical. The

12/1/00

Roy

Attached are copies
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plywood section and
testing priorities

- Dennis

Rich M

David B.

effects of wood species and steam recovery practices will be important variables to consider in design of a sampling effort for these types of pulp mills.

Obtaining speciated VOC information for paper machines and pulp dryers should also receive high priority. A wide array of furnishes (unbleached kraft, bleached kraft, sulfite, groundwood, recovered fiber, etc.), products (linerboard, fine papers, newsprint, tissue, specialty papers, etc.) and machine additives (dyes, defoamers, biocides, fillers, etc.) will undoubtedly need to be investigated. Very little usable information exists on emissions from paper machines at the present time. We do not think paper coating activities should be viewed as high priority since estimating techniques based on the properties of the coating materials appear to provide satisfactory emission estimates.

One additional area of pulp and paper manufacture which should receive high priority is that of repulping, bleaching and brightening of recovered fibers. With the exception of chloroform generated in recovered fiber bleaching with sodium hypochlorite, knowledge about VOC emissions from these sources is essentially non-existent. Considering the growth in recycled paper production, and questions being raised in air quality permitting proceedings for these facilities, obtaining emissions information merits high priority.

Regarding solid wood products manufacture, evaluating VOC emissions from lumber drying kilns (both direct wood-fired and steam heated) is very important, especially with respect to determining total annual VOC emission rates. Speciation of the VOCs, the majority of which are anticipated to be terpenes, for different softwood species such as southern yellow pine, Douglas fir and Ponderosa pine is highly desirable.

Of only slightly lesser importance is the gathering of additional VOC emissions data for softwood plywood veneer dryers which are drying veneer to higher moisture levels than in the past. As you know, almost all available veneer dryer emissions data are from the late 1970s to early 1980s period, when drying was carried out to lower final moisture levels. The differences in final moisture content may have implications for VOC emissions. In addition, measurements should be made with a consistent Method 25A procedure, since Method 25A is now being recommended by EPA for VOC measurements. Much of the earlier data were collected with Method 25 using varying filter temperatures.

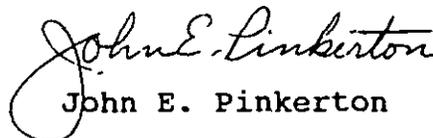
Concerning AP-42 information needs, a thorough analysis of formaldehyde measurements made with various testing methods should be conducted prior to publication of any formaldehyde

emission factors. As previously discussed with you and other EPA personnel, the industry has major concerns about the use of draft Method 0011 (DNPH) for panel plant sources. We would like to see additional simultaneous source testing done with the DNPH, chromatropic acid and acetylacetone methods. Although there is a great deal of formaldehyde test data available, resolving questions about the comparability of results obtained with different sampling methods is critical to determining if additional testing will be needed to develop reliable formaldehyde emission factors for reconstituted panel plant dryers and press vents.

Another important information gap exists for VOC and particulate emissions from wet and dry process hardboard mills. Refiner vents, tube dryers, press vents and curing ovens should be considered for future emission testing.

We are hopeful our perspectives on the emissions data needs for pulp and paper mills, panel plants and sawmills will assist the Agency in setting priorities for future testing programs in the wood products industry. Please feel free to call if you would like further elaboration on this subject.

Very truly yours,


John E. Pinkerton

cc: J. Southerland
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K. Bentley
R. Kaufmann
D. Word
A. Caron

Roy

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