

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 may be from a previous version of the section and no longer cited. The primary source should always be checked.

#32



111 S.W. Fifth Avenue  
Portland, Oregon 97204  
503/221-0800  
FAX: 503/796-0204

GOES WITH  
TEST REPORT  
# 28

4-50

December 28, 1995

Via Federal Express

Director, Air Enforcement Division  
U.S. EPA  
Ariel Rios Building, Room 1119  
Mail Code 2242A  
12th Street and Pennsylvania Ave., N.W.  
Washington, D.C. 20004

Mr. Laxmi Kesari  
Multi Media Enforcement & Strategic  
Planning Division  
United States Environmental Protection Agency  
401 M St. SW EPA W1041  
Mail Code 2248A  
Washington, D.C. 20460

re: Clean Air Enforcement Action - United States v. Louisiana-Pacific Corporation,  
No. CV 93-0869 (WD. La.)

Subject: Air Emissions Compliance Test Report - Louisiana-Pacific Corporation  
Dungannon VA OSB Plant

Gentlemen:

Louisiana-Pacific Corporation (L-P) recently discovered that the air emissions compliance test report for L-P's Dungannon, Virginia oriented strand board mill submitted to you on November 1, 1995 was incorrect with respect to the volatile organic compound (VOC) control efficiency. The test report and the earlier testing protocol approved by the United States Environmental Protection Agency (EPA) were incorrect concerning VOC control efficiency because the VOC removal from the wet scrubber on the dryer emissions was not considered. Paragraph 50 of the Consent Decree allows the VOC control efficiency to be determined from the inlet to the wet scrubber to the exit of the regenerative thermal oxidizer.

Director, Air Enforcement Division

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L-P will be submitting in the near future a revised testing protocol to the EPA for determining VOC control efficiency at the Dungannon mill. As soon as EPA approves that revised VOC testing protocol, L-P will conduct the tests and submit the results to the EPA. Until the additional VOC testing is completed, please disregard L-P's November 1, 1995 request for an alternate VOC control efficiency at the Dungannon mill.

Sincerely,



Elizabeth T. Smith, Director  
Environmental Affairs

cc: Julie Domike, US EPA, Air Enforcement Division, Washington, DC  
Bernard E. Turlinski, Chief, Air Enforcement Branch, US EPA Region III  
Crystal Bazyk, Virginia DEQ, Abingdon, VA  
Norm Radford Jr. - Vinson & Elkins, Dallas, TX  
David Dunn, ERM-Southeast, Inc.  
Gene Meyers  
Randy Bennett  
Mickey Mullins  
Lauri Newton



*Attach to report*

111 S.W. Fifth Avenue  
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November 1, 1995

Via Federal Express

Mr. Michael F. Wood, Director  
Mr. Laxmi Kesari  
Multi Media Enforcement & Strategic  
Planning Division  
United States Environmental Protection Agency  
401 M St. SW EPA W1041  
Washington, D.C. 20460

re: Clean Air Enforcement Action - United States v. Louisiana-Pacific Corporation,  
No. CV 93-0869 (WD. La.)

Subject: Air Emissions Compliance Test Report - Louisiana-Pacific Corporation  
Dungannon, VA OSB Plant

Dear Mr. Wood:

The enclosed air emissions compliance test report is being submitted for your review. Three copies of the report were sent to the Virginia Department of Environmental Quality as required by the State consent decree.

The report indicates that emissions from the RTO and Konus thermal oil heater at the Dungannon Plant are well within permitted limits. However, VOC destruction efficiencies through the RTO were calculated to be 79.83%, below the requirement set by the federal consent decree. This can be explained by reference to the compliance test results:

1. RTO inlet concentration of VOC, measured as a sum of press and dryer scrubber outlet concentrations, was 12.05 lb/hr.
2. RTO outlet concentration was 2.43 lb/hr, or 3.55 ppmdv, well below the permitted value of 9.4 lb/hr.
3. We feel that due to the low concentration of VOCs entering the RTO, it is unfeasible to achieve the required destruction efficiency.

Therefore, as stated in the First Amendment of the Consent Decree, paragraph 49A, Louisiana-Pacific Corporation requests EPA approval for an alternate control