

References #12

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.



11 February 1994

Mr. Dallas W. Safriet
Environmental Engineer
The United States Environmental Protection Agency
Emission Inventory Branch (MD-14)
Research Triangle Park, NC 27711

Dear Mr. Safriet,

The Barbecue Industry Association (BIA) appreciates the opportunity to review and comment on the draft version of Section 10.7, Charcoal Manufacturing that EPA is proposing to publish in a Supplement to AP-42.

In general, the information included in the draft for uncontrolled kilns is acceptable. The draft, as written does not adequately describe the majority of the charcoal industry today. The proposed write-up reflects emissions from uncontrolled kilns that characterized much of this industry in the past. Significant technological advances have been made in recent years throughout the industry and today uncontrolled kilns - that still exist in Missouri only - represent the exception rather than the norm in environmental performance for our industry. These advancements have enabled the industry to be much more environmentally responsible than the environmental performance achieved by uncontrolled kilns.

Today, for example, depending on site specific operations, the use of cyclones and afterburners on multiple hearth furnace systems is quite common to recover product and heat. They secondarily provide significant air pollution control benefits. These controlled continuous operations routinely provide greater than a 10 fold improvement in emissions as compared to uncontrolled kilns. Permits for some of these type facilities, requiring even greater than a 10 fold emission reduction, are in place today in the charcoal industry. Similar improvements have been made with kilns through the use of incineration systems.

Barbecue Industry Association

710 E. Ogden, Suite 113 • Naperville, Illinois 60563 • 708/369-2404 • Fax: 708/369-2488

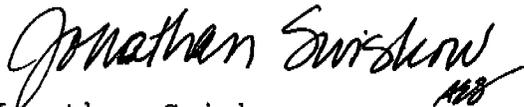
CHARCOAL • GRILLS • LIGHTERS • UTENSILS • SUPPLIERS • FOOD

Mr. Dallas Safriet
February 11, 1994
Page Two

The BIA would like to extend an offer to propose a draft rewrite of this section of AP-42 for EPA to include additional information on charcoal production systems that exist today. On general, the information included in the draft for uncontrolled kilns is acceptable.

We await your reply.

Sincerely yours,

A handwritten signature in cursive script that reads "Jonathan Swiskow". The signature is written in dark ink and includes a stylized flourish at the end.

Jonathan Swiskow
Chairman, Charcoal SIG, BIA

