



A DIVISION OF
VULCAN MATERIALS COMPANY

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.

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AP-42 Section 10.8
Reference 7
Report Sect. 2
Reference 7

August 9, 1996

Mr. Dallas Safriet
Emission Factor and Inventory Group
Emissions Monitoring and Analysis Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
Research Triangle Park, NC 27711

Re: Revised Draft Report, Wood Preserving, Section 10.8, AP-42

Dear Mr. Safriet:

Vulcan Chemicals appreciates the opportunity to have reviewed the June 1996 draft of the Wood Preserving section of AP-42. As the only U.S. manufacturer of pentachlorophenol, our comments on the draft are restricted to this preservative.

Since this draft of the report does not contain any emission factors for pentachlorophenol, our comments are somewhat administrative in nature. Our comments are as follows:

1. In Table 2-3 on page 2-5, the composition of pentachlorophenol solutions is incorrect. The composition should read: chlorinated phenols, $\geq 5\%$; hydrocarbon solvents $\leq 95\%$.
2. On page 2-6, the verbal description of pentachlorophenol solutions is incorrect. Heavy petroleum oils are the dominant solvent carrier used. This section should be revised to read: "These solutions consist primarily of chlorinated phenols and heavy petroleum oils. Methylene chloride and liquid petroleum gas have also been used as solvents in pentachlorophenol solutions but are no longer in use in the United States. The primary use of pentachlorophenol solutions is in the treatment of utility poles."
3. Vulcan Chemicals requests that a statement be added to the Emission Factor Documentation and to the final Section 10.8, that qualitatively describes the low potential for emission of significant quantities of pentachlorophenol. Vulcan presented substantial documentation to EPA in support of removal of pentachlorophenol wood preserving processes from the "major source" industry category, and EPA has done this based upon their assessment that the potential emissions of pentachlorophenol are small.

In our report "Engineering Calculations of Pentachlorophenol Air Emissions at Wood Preserving Facilities", dated 9/1/94, the estimated annual process emissions of pentachlorophenol from a typical large wood preserving facility were only 1.31 pounds, and emissions from the finished goods were only 16.38 pounds. While this report could not be used for AP-42 emission factor determination, it does agree well with industry emissions as reported on SARA Form R's.

Perhaps a statement could be added to Section 2.3 Emissions, page 2-12; and to paragraph 10.8.2 Emissions, page 10.8-6; which states that: "Emissions of pentachlorophenol from processes using this preservative are generally not significant." This could be inserted after the statement describing the primary sources of emissions from oil-borne preservatives in the first paragraph of both of these sections.

Vulcan Chemicals sincerely appreciates being given the opportunity to participate in this process, and if we can be of further assistance please let us know.

Sincerely,



Carleton W. Degges
Environmental Coordinator

at

c: Martin Rollins - HM Rollins Company
George Parris - AWPI