

BACKGROUND DOCUMENT

SECTION 4.5 WASTE SOLVENT RECLAMATION

The only available document that lists emission factors for waste solvent reclamation is Monsanto Research Corporation's Source Assessment: Reclaiming of Waste Solvents - State of the Art (Reference 1). Accordingly, Table 4.5-1 of Section 4.5 is adapted from Table 6 of this reference.

Footnote a of Table 4.5-1 states that the data in this table were obtained "from state air pollution control agencies and presurvey sampling." These agencies are not documented elsewhere in Reference 1. Appendix B of Reference 1 is entitled "Results and Sample Calculations for Presurvey Sampling of Private Contractor Solvent Reclaiming Plant," but neither the storage tank vent nor the condenser vent emission factors calculated therein correspond to the factors published in Table 6 of the report and reproduced in Table 4.5-1 of AP-42 Section 4.5.

It is possible that the information given in Appendix B of Reference 1 does pertain to the emission factors that appear in Table 6 of the same reference (i.e., Table 4.5-1 of AP-42 Section 4.5). However, if this is the case, the authors of Reference 1 have not made the connection clear.

The control efficiencies mentioned in Section 4.5.2 are given in the references cited, which in no case provide background data for these percentages.

The amount of source test data is not specified in Reference 1. The process is highly variable and depends on the particular solvent and recovery scheme used. The data on which material balance calculations could be based is also not specified in Reference 1. For these reasons the rating of D was assigned to all emission factors in Table 4.5-1.