

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shurr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

December 12, 1995

Lori Juergens
Shell Engineering
2403 West Ash
Columbia, MO 65203

Dear Ms. Juergens:

We have reviewed your proposal of emission factors for each emission point of the briquetting process. We agree that it is a more acceptable way to calculate emissions for each point source rather than using the one emission factor for the entire briquetting process.

Since the new section of AP-42 still uses the 24.1 pounds per ton for Particulate Matter - ten microns or less for the entire process and does not address the individual steps in the briquetting process, we do not have many options except to borrow emission factors from processes as similar as possible to the briquetting sources of air pollution.

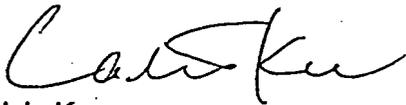
Our original list used emission factors from many other industries and we believe that these factors more closely represent the briquetting processes than the factors you proposed. By breaking down the steps, the total of all the emission factors is already lower than the overall factor of 24.1 pounds per ton of charcoal produced. We would consider revising the emission factors if you can provide documentation or testing.

We have revised our original table to correspond with some of the changes in the new Factor Information Retrieval version of emission factors. We have also deleted the Total Suspended Particulate emission factors since those emissions will not be reported on the 1995 Emissions Inventory Questionnaire forms. The revised table is enclosed for your information.

If you have any questions, please contact Janice Eggen of my staff at (314) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Calvin Ku
Technical Support Section Chief

CK:jet

c: Randy Raymond, APCP

Enclosure



CHARCOAL SCCs and Emission Factors

		<u>PM10</u>
1.	Charcoal Kiln 3-01-006-03 Batch Kiln SCC Emission Factor (EF) Units: Tons Produced OTHER CRITERIA POLLUTANTS: Nox 24.0 VOC 270 CO 290	297.6
2.	Charcoal Unloading 3-07-030-02 Wood Waste Storage Bin Loadout SCC EF Units: Tons	1.2
3.	Charcoal Storage 3-05-016-10 Raw Material Storage Piles (Lime) SCC EF Units: Tons	1.40
4.	Charcoal Loading into Bin/Hopper 3-07-008-03 Sawdust Pile Handling SCC EF Units: Tons	0.36
5.	Conveying Charcoal/Starch/Lime 3-05-016-07 Raw Material Transfer/Conveying (Lime) SCC EF Units: Tons	0.18
6.	Charcoal Crushing 3-05-016-01 Primary Crushing (Lime) SCC EF Units: Tons	0.26
7.	Charcoal Loading into Silo/Hopper/Bin 3-05-011-07 Cement Unloading: Storage Bins SCC EF Units: Tons	0.14
8.	Pulvarizing Charcoal 3-05-016-02 Secondary Crushing SCC EF Units: Tons	1.13
9.	Screening of Granular Charcoal 3-05-025-11 Screening Sand/Gravel SCC EF Units: Tons	0.12
10.	Lignite/Sawdust/Coal: If available, use SCCs for that category. If no SCC, use the same as for Charcoal Processing.	

11.	Mixing Charcoal Briquet Ingredients		
	3-05-011-09 Mixer Loading of Cement/Sand/Aggregate		0.02
	SCC EF		
	Units: Tons		
12.	Charcoal Mix to Bins by Elevator Legs		
	3-02-005-08 Feed/Grain Elevator Legs		0.23
	SCC EF		
	Units: Tons		
13.	Roll Press Briquetting		
	3-05-016-02 Secondary Crushing/Screening (Lime)		1.13
	SCC EF		
	Units: Tons		
14.	Briquet Drying/Cooling		
	3-05-020-12 Stone Drying		5.0
	SCC EF		
	Units: Tons		
15.	Conveying/Handling of Briquets		
	3-05-010-11 Coal Transfer		0.1
	SCC EF		
	Units: Tons		
16.	Screening of Briquets		
	3-05-010-12 Coal Screening		0.08
	SCC EF		
	Units: Tons		
17.	Bagging of Briquets		
	3-01-005-08 Bagging/Loading Carbon Black		0.06
	SCC EF		
	Units: Tons		
18.	Bagging of Granular Charcoal		
	3-05-016-14 Packaging/Shipping Lime		0.12
	SCC EF		
	Units: Tons		

Revised 12/1/95

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