4A-01

INTRODUCTION

Emission factors and emission inventories have long been fundamental tools for air quality management. Emission estimates are important for developing emission control strategies, determining applicability of permitting and control programs, ascertaining the effects of sources and appropriate mitigation strategies, and a number of other related applications by an array of users, including federal, state, and local agencies, consultants, and industry. Data from source-specific emission tests or continuous emission monitors are usually preferred for estimating a source's emissions because those data provide the best representation of the tested source's emissions. However, test data from individual sources are not always available and, even then, they may not reflect the variability of actual emissions over time. Thus, emission factors are frequently the best or only method available for estimating emissions, in spite of their limitations.

The passage of the *Clean Air Act Amendments Of 1990* (*CAAA*) and the *Emergency Planning And Community Right-To-Know Act* (*EPCRA*) of 1986 has increased the need for both criteria and Hazardous air pollutant (HAP) emission factors and inventories. The Emission Factor And Inventory Group (EFIG), in the U. S. Environmental Protection Agency's (EPA) Office Of Air Quality Planning And Standards (OAQPS), develops and maintains emission estimating tools to support the many activities mentioned above. The AP-42 series is the principal means by which EFIG can document its emission factors. These factors are cited in numerous other EPA publications and electronic data bases, but without the process details and supporting reference material provided in AP-42.

What Is An AP-42 Emission Factor?

An emission factor is a representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant. These factors are usually expressed as the weight of pollutant divided by a unit weight, volume, distance, or duration of the activity emitting the pollutant (e. g., kilograms of particulate emitted per megagram of coal burned). Such factors facilitate estimation of emissions from various sources of air pollution. In most cases, these factors are simply averages of all available data of acceptable quality, and are generally assumed to be representative of long-term averages for all facilities in the source category (i. e., a population average).

The general equation for emission estimation is:

$$E = A \times EF \times (1-ER/100)$$

where:

E = emissions,
A = activity rate,
EF = emission factor, and
ER = overall emission reduction efficiency, %.

ER is further defined as the product of the control device destruction or removal efficiency and the capture efficiency of the control system. When estimating emissions for a long time period

(e. g., one year), both the device and the capture efficiency terms should account for upset periods as well as routine operations.

Emission factor ratings in AP-42 (discussed below) provide indications of the robustness, or appropriateness, of emission factors for estimating average emissions for a source activity. Usually, data are insufficient to indicate the influence of various process parameters such as temperature and reactant concentrations. For a few cases, however, such as in estimating emissions from petroleum storage tanks, this document contains empirical formulae (or emission models) that relate emissions to variables such as tank diameter, liquid temperature, and wind velocity. Emission factor formulae that account for the influence of such variables tend to yield more realistic estimates than would factors that do not consider those parameters.

The extent of completeness and detail of the emissions information in AP-42 is determined by the information available from published references. Emissions from some processes are better documented than others. For example, several emission factors may be listed for the production of one substance: one factor for each of a number of steps in the production process such as neutralization, drying, distillation, and other operations. However, because of less extensive information, only one emission factor may be given for production facility releases for another substance, though emissions are probably produced during several intermediate steps. There may be more than one emission factor for the production of a certain substance because differing production processes may exist, or because different control devices may be used. Therefore, it is necessary to look at more than just the emission factor for a particular application and to observe details in the text and in table footnotes.

The fact that an emission factor for a pollutant or process is not available from EPA does not imply that the Agency believes the source does not emit that pollutant or that the source should not be inventoried, but it is only that EPA does not have enough data to provide any advice.

Uses Of Emission Factors

Emission factors may be appropriate to use in a number of situations such as making source-specific emission estimates for areawide inventories. These inventories have many purposes including ambient dispersion modeling and analysis, control strategy development, and in screening sources for compliance investigations. Emission factor use may also be appropriate in some permitting applications, such as in applicability determinations and in establishing operating permit fees.

Emission factors in AP-42 are neither EPA-recommended emission limits (e. g., best available control technology or BACT, or lowest achievable emission rate or LAER) nor standards (e. g., National Emission Standard for Hazardous Air Pollutants or NESHAP, or New Source Performance Standards or NSPS). Use of these factors as source-specific permit limits and/or as emission regulation compliance determinations is not recommended by EPA. Because emission factors essentially represent an average of a range of emission rates, approximately half of the subject sources will have emission rates greater than the emission factor and the other half will have emission rates less than the factor. As such, a permit limit using an AP-42 emission factor would result in half of the sources being in noncompliance.

Also, for some sources, emission factors may be presented for facilities having air pollution control equipment in place. Factors noted as being influenced by control technology do not necessarily reflect the best available or state-of-the-art controls, but rather reflect the level of (typical) control for which data were available at the time the information was published. Sources often are

tested more frequently when they are new and when they are believed to be operating properly, and either situation may bias the results.

As stated, source-specific tests or continuous emission monitors can determine the actual pollutant contribution from an existing source better than can emission factors. Even then, the results will be applicable only to the conditions existing at the time of the testing or monitoring. To provide the best estimate of longer-term (e. g., yearly or typical day) emissions, these conditions should be representative of the source's routine operations.

A material balance approach also may provide reliable average emission estimates for specific sources. For some sources, a material balance may provide a better estimate of emissions than emission tests would. In general, material balances are appropriate for use in situations where a high percentage of material is lost to the atmosphere (e. g., sulfur in fuel, or solvent loss in an uncontrolled coating process.) In contrast, material balances may be inappropriate where material is consumed or chemically combined in the process, or where losses to the atmosphere are a small portion of the total process throughput. As the term implies, one needs to account for all the materials going into and coming out of the process for such an emission estimation to be credible.

If representative source-specific data cannot be obtained, emissions information from equipment vendors, particularly emission performance guarantees or actual test data from similar equipment, is a better source of information for permitting decisions than an AP-42 emission factor. When such information is not available, use of emission factors may be necessary as a last resort. Whenever factors are used, one should be aware of their limitations in accurately representing a particular facility, and the risks of using emission factors in such situations should be evaluated against the costs of further testing or analyses.

Figure 1 depicts various approaches to emission estimation, in a hierarchy of requirements and levels of sophistication, that one should consider when analyzing the tradeoffs between cost of the estimates and the quality of the resulting estimates. Where risks of either adverse environmental effects or adverse regulatory outcomes are high, more sophisticated and more costly emission determination methods may be necessary. Where the risks of using a poor estimate are low, and the costs of more extensive methods are unattractive, then less expensive estimation methods such as emission factors and emission models may be both satisfactory and appropriate. In cases where no emission factors are available but adverse risk is low, it may even be acceptable to apply factors from similar source categories using engineering judgment. Selecting the method to be used to estimate source-specific emissions may warrant a case-by-case analysis considering the costs and risks in the specific situation. All sources and regulatory agencies should be aware of these risks and costs and should assess them accordingly.

Variability Of Emissions

Average emissions differ significantly from source to source and, therefore, emission factors frequently may not provide adequate estimates of the average emissions for a specific source. The extent of between-source variability that exists, even among similar individual sources, can be large depending on process, control system, and pollutant. Although the causes of this variability are considered in emission factor development, this type of information is seldom included in emission test reports used to develop AP-42 factors. As a result, some emission factors are derived from tests that may vary by an order of magnitude or more. Even when the major process variables are accounted for, the emission factors developed may be the result of averaging source tests that differ by factors of five or more.

4A-04

WOOD PRODUCTS IN THE WASTE STREAM: CHARACTERIZATION AND COMBUSTION EMISSIONS

Final Report

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- To compare emission factors from commercial/industrial wood boilers to those from residential wood combustion appliances; and

- To evaluate the capability of different boiler designs and waste wood fuels to meet regulatory standards.

Key Findings

- Criteria and non-criteria pollutant emissions data from over 100 wood combustors have been located and summarized into consistent units for convenient evaluation. Overall, the data should be useful in characterizing emissions from wood combustors. However, the statistical summaries should be used with caution due to the wide variation in boiler designs, sizes, fuel sources and combustion controls represented by the many data sources.

- Relatively few sources of emissions data were found on combustion of C/D, railroad ties, telephone poles or other "treated" wood. Comparison of these data with those from "clean" wood combustion at the same sources indicates that organic emissions are generally not increased from combustion of "treated" wood. While metals emission data from these sources were very limited, the data indicate only slightly higher levels for "treated" wood combustion.

- Organic compounds regulated as hazardous air pollutants that have been measured in detectable amounts in wood combustor flue gas include aldehydes, benzene, phenol, and polynuclear aromatic hydrocarbons (PAH). These compounds are formed as products of incomplete combustion and do not appear to be a function of wood composition or source. Instead, they appear to be correlated to emissions of carbon monoxide and total hydrocarbons, which are also indicative of combustion inefficiency. "Good" combustion conditions appear to minimize organic emissions.

- Metals usually found in wood combustor particulate include arsenic, chromium, copper, lead, zinc, aluminum, titanium, iron, and manganese. Emissions estimated from wood and ash composition data summarized in Chapter 7 indicate that C/D wood samples obtained for this research probably contained higher concentrations of metals than wood fuel usually combusted at existing facilities for which emissions data were found.

- Particulate emissions vary according to the type of particulate control device (electrostatic precipitators and baghouses perform the best, followed by wet scrubbers and mechanical cyclones).

- Metals control efficiency appears to be roughly equivalent to total particulate control efficiency with the exception of mercury.

- Chlorinated organic compounds, such as dioxins, furans, polychlorinated