MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

May 25, 2016

PERMIT TO INSTALL 24-10A

ISSUED TO HarbisonWalker International, Inc.

LOCATED AT 1301 East 8th Street White Cloud, Michigan

IN THE COUNTY OF

Newaygo

STATE REGISTRATION NUMBER B5777

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: May 9, 2016

DATE PERMIT TO INSTALL APPROVED: May 25, 2016	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations		
AQD	Air Quality Division	acfm	Actual cubic feet per minute	
BACT	Best Available Control Technology	BTU	British Thermal Unit	
CAA	Clean Air Act	°C	Degrees Celsius	
CAM	Compliance Assurance Monitoring	со	Carbon Monoxide	
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent	
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot	
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter	
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit	
department	Quality	gr	Grains	
EU	Emission Unit	HAP	Hazardous Air Pollutant	
FG	Flexible Group	Hg	Mercury	
GACS	Gallons of Applied Coating Solids	hr	Hour	
GC	General Condition	HP	Horsepower	
GHGs	Greenhouse Gases	H ₂ S	Hydrogen Sulfide	
HVLP	High Volume Low Pressure*	kW	Kilowatt	
ID	Identification	lb	Pound	
IRSL	Initial Risk Screening Level	m	Meter	
ITSL	Initial Threshold Screening Level	mg	Milligram	
LAER	Lowest Achievable Emission Rate	mm	Millimeter	
MACT	Maximum Achievable Control Technology	MM	Million	
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts	
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds	
MDEQ	Michigan Department of Environmental Quality	NOx	Oxides of Nitrogen	
MSDS	Material Safety Data Sheet	ng PM	Nanogram Particulate Matter	
NA	Not Applicable		Particulate Matter equal to or less than 10	
NAAQS	National Ambient Air Quality Standards	PM10	microns in diameter	
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter	
NSPS	New Source Performance Standards	pph	Pounds per hour	
NSR	New Source Review	ppm	Parts per million	
PS	Performance Specification	ppmv	Parts per million by volume	
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight	
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute	
PTI	Permit to Install	psig	Pounds per square inch gauge	
RACT	Reasonable Available Control Technology	scf	Standard cubic feet	
ROP	Renewable Operating Permit	sec	Seconds	
SC	Special Condition	SO ₂	Sulfur Dioxide	
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant	
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature	
SRN	State Registration Number	THC	Total Hydrocarbons	
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year	
USEPA/EPA	United States Environmental Protection	μg	Microgram	
		μm	Micrometer or Micron	
VE	Visible Emissions	VOC	Volatile Organic Compounds	
		yr	Year	

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

GENERAL CONDITIONS

- The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUSTORAGEBINS	Storage bins associated with the storage of powdered pitch containing benzo(a)pyrene.	5/25/2016	NA
EUMIXERS	Three brick component mechanical mixers. The mixed components are sent on to the brick press from the mixers.	1977, 1987, 1988, 5/25/2016	NA
EUBRICKOVENS	Three natural gas-fired ovens used to cure refractory bricks. The ovens are referred to as Oven No. 1, Oven No. 2, and the Dryer. VOC emissions from the three ovens are controlled by a single catalytic oxidizer.	1977, 1977, 1981, 2/23/2010, 5/25/2016	NA
Changes to the equipm by R 336.1278 to R 336	ent described in this table are subject to the requi 5.1290.	rements of R 336.120	1, except as allowed

The following conditions apply to: EUSTORAGEBINS

DESCRIPTION: Storage bins associated with the storage of powdered pitch containing benzo(a)pyrene.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Particulate emissions are controlled by bin vents with HEPA filters.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EUSTORAGEBINS unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted no less than 60 days prior to commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EUSTORAGEBINS unless the HEPA filters are installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1910)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record all data specified by the MAP required in SC III.1. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)
- The permittee shall monitor and record all parameters specified by the MAP required in SC III.1. All records shall be kept on file at the site and made available to the Department upon request. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

VII. <u>REPORTING</u>

 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTIONS

1. The permittee shall not directly vent any portion of EUSTORAGEBINS to the ambient air. (R 336.1224, R 336.1225, R 336.1901)

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to: EUMIXERS

DESCRIPTION: Three brick component mechanical mixers. The mixed components are sent on to the brick press from the mixers.

Flexible Group ID: NA

<u>POLLUTION CONTROL EQUIPMENT</u>: Particulate emissions are controlled by a cyclone followed by a dust collector.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EUMIXER unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted no less than 60 days prior to commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EUMIXER unless the cyclone and dust collector are installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1224, R 336.1225, R 336.1910)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record all data specified by the MAP required in SC III.1. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)
- The permittee shall monitor and record all parameters specified by the MAP required in SC III.1. All records shall be kept on file at the site and made available to the Department upon request. (R 336.1224, R 336.1225, R 336.1910, R 336.1911)

VII. <u>REPORTING</u>

 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVMIXER	28.75 X 32	67	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to: EUBRICKOVENS

DESCRIPTION: Three natural gas-fired ovens used to cure refractory bricks. The ovens are referred to as Oven No. 1, Oven No. 2, and the Dryer. VOC emissions from the three ovens are controlled by a single catalytic oxidizer.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: VOC emissions from the three ovens are controlled by a single catalytic oxidizer.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	0.87 pph	Test Protocol*	EUBRICKOVENS	SC V.1	R 336.1702(a)
2. VOCs	1.0 tpy	12-month rolling time period as determined at the end of each calendar month.	EUBRICKOVENS	SC VI.4	R 336.1702(a)
3. Formaldehyde	0.030 pph	Test Protocol*	EUBRICKOVENS	SC V.2	R 336.1225, R 336.1901
4. Benzo(a)pyrene	0.00011 pph	Test Protocol*	EUBRICKOVENS	SC V.1	R 336.1205, R 336.1225
*Test Protocol shall specify averaging time.					

II. MATERIAL LIMITS

- 1. The permittee shall not cure more than 80,000 tons of refractory bricks in EUBRICKOVENS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d))
- 2. The permittee shall not cure more than 6,063 tons of refractory bricks that use the benzo(a)pyrene containing pitch in EUBRICKOVENS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d))
- 3. The permittee shall burn only natural gas as fuel in EUBRICKOVENS. (R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EUBRICKOVENS unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted no less than 60 days prior to commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EUBRICKOVENS unless the catalytic oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the catalytic oxidizer includes a minimum VOC destruction efficiency of 90 percent (by weight), a minimum catalyst bed inlet temperature of 700°F, and a maximum space velocity of 51,700 inverse hours. (R 336.1225, R 336.1702, R 336.1901, R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device to continuously monitor the inlet and outlet temperatures of the catalytic oxidizer catalyst bed. (R 336.1225, R 336.1702, R 336.1901, R 336.1910)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record all data specified by the MAP required in SC III.1. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1911)
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas combusted in EUBRICKOVENS on a continuous basis. (R 336.1225, R 336.1702, R 336.1901)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- Within 180 days after commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch, the permittee shall verify benzo(a)pyrene and VOC emission limits from EUBRICKOVENS and the VOC destruction efficiency of the catalytic oxidizer portion of EUBRICKOVENS by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.2001, R 336.2003, R 336.2004)
- 2. Upon request from the AQD District Supervisor, the permittee may be required to verify the formaldehyde emission limit from EUBRICKOVENS by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1225, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1911)
- 2. The permittee shall monitor and record the inlet and outlet temperatures of the catalytic oxidizer catalyst bed on a continuous basis. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901, R 336.1910)
- 3. The permittee shall monitor and record all parameters specified by the MAP required in SC III.1. All records shall be kept on file at the site and made available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1911)
- 4. The permittee shall keep the following information on a monthly basis for EUBRICKOVENS:
 - a. The total amount of natural gas combusted.
 - b. The tons of total bricks cured per calendar month and per 12-month rolling time period as determined at the end of each calendar month.
 - c. The tons of bricks cured that use the benzo(a)pyrene containing pitch per calendar month and per 12-month rolling time period as determined at the end of each calendar month.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

VII. <u>REPORTING</u>

 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of producing refractory bricks that use the benzo(a)pyrene containing pitch. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBRICKOVENS	36.0	73.0	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA