MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

July 22, 2020

PERMIT TO INSTALL

1-09A

ISSUED TO

Devereaux Sawmill, Inc.

LOCATED AT

2872 North Hubbardston Road Pewamo, Michigan 48873

IN THE COUNTY OF

Ionia

STATE REGISTRATION NUMBER N2157

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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:			
July 14, 2020			
,			
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:		
July 22, 2020			
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

Best Available Control Technology BACT

CAA Clean Air Act

CAM **Compliance Assurance Monitoring** Continuous Emission Monitoring System **CEMS**

Code of Federal Regulations CFR

Continuous Opacity Monitoring System COMS

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

Emission Unit EU FG Flexible Group

Gallons of Applied Coating Solids **GACS**

General Condition GC **GHGs** Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSL Initial Risk Screening Level Initial Threshold Screening Level ITSL Lowest Achievable Emission Rate **LAER** Maximum Achievable Control Technology MACT **MAERS** Michigan Air Emissions Reporting System

MAP Malfunction Abatement Plan **MSDS** Material Safety Data Sheet

Not Applicable NA

National Ambient Air Quality Standards **NAAQS**

National Emission Standard for Hazardous Air Pollutants **NESHAP**

New Source Performance Standards NSPS

NSR **New Source Review** PS Performance Specification

Prevention of Significant Deterioration **PSD**

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

Renewable Operating Permit **ROP**

Special Condition SC

Selective Catalytic Reduction SCR Selective Non-Catalytic Reduction SNCR SRN State Registration Number

TBD To Be Determined

Toxicity Equivalence Quotient TEQ

USEPA/EPA United States Environmental Protection Agency

Visible Emissions VΕ

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit °C Degrees Celsius CO Carbon Monoxide

CO2e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter Pegrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

kW Kilowatt

lb Pound

m Meter

mg Milligram

mm Millimeter

MM Million

MW Megawatts

NMOC Non-Methane Organic Compounds

NO_x Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter

pph Pounds per hour ppm Parts per million

ppmv Parts per million by volume
ppmw Parts per million by weight
psia Pounds per square inch abs

psia Pounds per square inch absolute psig Pounds per square inch gauge

scf Standard cubic feet

sec Seconds SO₂ Sulfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature THC Total Hydrocarbons

tpy Tons per year

µg Microgram

µm Micrometer or Micron
VOC Volatile Organic Compounds

Voiatile Organie Compo

yr Year

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GENERAL CONDITIONS

1. 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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (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 conditions or malfunction has been corrected, or within 30 days of discovery of 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.

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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 Rule 301, 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 Rule 303 (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.
- 12. 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 Rule 370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT 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 (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-KILN1	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF. (MBF is equivalent to one thousand board feet.)	1999 thru 2006	FG-KILNS
EU-KILN2	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN3	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN4	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF.	1999 thru 2006	FG-KILNS
EU-KILN5	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN6	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN7	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN8	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN9	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN10	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN11	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF.	1999 thru 2006	FG-KILNS
EU-KILN12	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF.	1999 thru 2006	FG-KILNS
EU-KILN13	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF.	1999 thru 2006	FG-KILNS
EU-KILN14	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN15	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	1999 thru 2006	FG-KILNS
EU-KILN16	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	November 2017	FG-KILNS16-17-18
EU-KILN17	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	November 2017	FG-KILNS16-17-18
EU-KILN18	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF.	November 2017	FG-KILNS16-17-18

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-KILNS	Fifteen indirect steam-heated lumber drying kilns.	EU-KILN1, EU-KILN2, EU-KILN3, EU-KILN4, EU-KILN5, EU-KILN6, EU-KILN7, EU-KILN8, EU-KILN9, EU-KILN10, EU-KILN11, EU-KILN12, EU-KILN13, EU-KILN14,
FG-KILNS16-17-18	Three indirect steam-heated lumber drying kilns.	EU-KILN16, EU-KILN17, EU-KILN18

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FG-KILNS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Fifteen indirect steam-heated lumber drying kilns.

Emission Unit: EU-KILN1, EU-KILN2, EU-KILN3, EU-KILN4, EU-KILN5, EU-KILN6, EU-KILN7, EU-KILN8, EU-KILN9, EU-KILN10, EU-KILN11, EU-KILN12, EU-KILN13, EU-KILN14, EU-KILN15

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
VOCs (as carbon)	52.9 tpy*	12-month rolling time period as determined at		SC II.2, SC VI.2	R 336.1205, R 336.1702(a)
,		the end of each calendar month			(1)

^{*} VOC calculations are based on the amount of wood dried (in thousand board feet, MBF) multiplied by its corresponding VOC emission factor in pounds carbon per thousand board feet (lbs C/MBF).

II. MATERIAL LIMIT(S)

- 1. The permittee shall only process hardwood in FG-KILNS. Hardwood is defined as the wood of a broad-leafed tree, either deciduous or evergreen. (R 336.1225, R 336.1702(a))
- 2. The permittee shall not dry more than 24,600 MBF of wood in FG-KILNS per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

NA

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))

1. 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)

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- 2. The permittee shall keep the following information on a monthly basis for FG-KILNS:
 - a) The wood species and amount in MBF dried per calendar month.
 - b) The wood species and amount in MBF dried per 12-month rolling time period as determined at the end of each calendar month.
 - c) The VOC emission factor (in lbs C/MBF) for each wood species dried. (The worse-case VOC emission factor is assumed to be 4.3 lbs C/MBF. VOC emissions in general are based on emission factors from "Factors Affecting Lumber Kiln VOC Emissions," M.R. Milota, Oregon State University or an alternative method acceptable to the AQD District Supervisor.)
 - 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 records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702(a))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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.	SV-KILN1F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
2.	SV-KILN1R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
3.	SV-KILN2F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
4.	SV-KILN2R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
5.	SV-KILN3F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
6.	SV-KILN3R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
7.	SV-KILN4F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
8.	SV-KILN4R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
9.	SV-KILN5F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
10.	SV-KILN5R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
11.	SV-KILN6F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
12.	SV-KILN6R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
13. SV-KILN7F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
14. SV-KILN7R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
15. SV-KILN8F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
16. SV-KILN8R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
17. SV-KILN9F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
18. SV-KILN9R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
19. SV-KILN10F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
20. SV-KILN10R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
21. SV-KILN11F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
22. SV-KILN11R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
23. SV-KILN12F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
24. SV-KILN12R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
25. SV-KILN13F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
26. SV-KILN13R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
27. SV-KILN14F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
28. SV-KILN14R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
29. SV-KILN15F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
30. SV-KILN15R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
* Vents are horizontal.			

IX. OTHER REQUIREMENT(S)

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FG-KILNS16-17-18 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three indirect steam-heated lumber drying kilns.

Emission Unit: EU-KILN16, EU-KILN17, EU-KILN18

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOCs (as carbon)	10.7 tpy*	12-month rolling time period as determined at the end of each calendar month	FG-KILNS16-17-18	SC II.2, SC VI.2	R 336.1205, R 336.1702(a)

^{*} VOC calculations are based on the amount of wood dried (in thousand board feet, MBF) multiplied by its corresponding VOC emission factor in pounds carbon per thousand board feet (lbs C/MBF).

II. MATERIAL LIMIT(S)

- 1. The permittee shall only process hardwood in FG-KILNS16-17-18. (Hardwood is defined as the wood of a broad-leafed tree, either deciduous or evergreen.) (R 336.1225, R 336.1702(a))
- 2. The permittee shall not dry more than 4,950 MBF of wood in FG-KILNS16-17-18 per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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))

1. 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)

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- 2. The permittee shall keep the following information on a monthly basis for FG- KILNS16-17-18:
 - a) The wood species and amount in MBF dried per calendar month.
 - b) The wood species and amount in MBF dried per 12-month rolling time period as determined at the end of each calendar month.
 - c) The VOC emission factor (in lbs C/MBF) for each wood species dried. If a VOC emission factor for each species is not available, the worst-case VOC emission factor is assumed to be 4.3 lbs C/MBF. VOC emissions in general are based on emission factors from "Factors Affecting Lumber Kiln VOC Emissions," M.R. Milota, Oregon State University. Other emission factors may be approved by the AQD District Supervisor.
 - 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 records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702(a))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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
SV-KILN16F (front exhaust, 1 vent) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-KILN16R (rear exhaust, 1 vent) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-KILN17F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-KILN17R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV-KILN18F (front exhaust, 2 vents) *	NA	26.1	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV-KILN18R (rear exhaust, 2 vents) *	NA	17.5	R 336.1225, 40 CFR 52.21(c) & (d)
* Vents are horizontal.			. , , , ,

IX. OTHER REQUIREMENT(S)

NA