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Brick and Structural Clay Products Manufacturers - EPA Proposed Regulation

ENERGY & RESOURCES, MANUFACTURING
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On December 18, 2014, the Environmental Protection Agency (EPA) proposed National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing (BSCP) and Clay Ceramics Manufacturing. According to the EPA, these categories of products contain major levels of hydrogen fluoride, hydrogen chloride and hazardous metals, all of which are associated with a variety of health disorders, including cancer.

The proposed regulation for BSCP would seek to limit the emissions that arise during the manufacture of various brick products, clay pipe, roof tile, extruded floor and wall tile and other clay products. Clay ceramics includes facilities that manufacture pressed floor tile, pressed wall tile and other pressed tile and sanitary ware, such as sinks and toilets. The manufacturing of brick and structural clay products involves mining, raw material processing (crushing, grinding and screening), mixing, forming, cutting or shaping, drying and firing. The primary source of these hazardous air pollutant emissions are kilns, including tunnel kilns and periodic kilns. Among other things, owners/operators would be required to conduct an initial performance test using specified EPA test methods (and on regular intervals thereafter, i.e., upon renewal of operating permits) to ensure that emission levels are not excessive. The proposed regulation will apply to sources of hazardous air pollutant emissions that emit, or have the potential to emit, 10 tons per year or more of any hazardous air pollutant, or 25 tons per year or more of any combination of hazardous air pollutants.

The public comment period for the proposed regulation published in the Federal Register has been extended until March 19, 2015.

For more information regarding the proposed regulation, please contact your Schneider Downs representative or visit the [EPA website](#).

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