AP42 Section:	11.3
Background Chapter	4
Reference:	31
Title:	Jensen, J., *The Belden Brick Company Plant 6 Grinding Plant EPA Ambient Air Samples*, Belden Brick Company, Sugarcreek, OH, June 7, 1995.

EXHIBIT A

Filename:
P6GRD.AIR

THE BELDEN BRICK COMPANY
PLANT 6 GRINDING PLANT
EPA AMBIENT AIR SAMPLES

INTRODUCTION:

The USEPA draft of the proposed AP-42 revision Section 11.3 for the Brick and Structural Clay Product Manufacturing incorrectly assumes that the dust measured on the inlet side of a grinding plant baghouse would, in fact, be 100% released to the atmosphere.

Ambient air tests run 11/9/93 and 11/11/93 during the Belden USEPA tests indicate that only 4.33% of the dust inside the grinding plant leaves the grinding plant and thus affects the ambient air.

CALCULATIONS: (From page 3-18 of Draft Report dated July 27, 1994)

	1 g/DSCF	2 g/DSCF	3 g/DSCF	Average g/DSCF
Inside grinding plant.....	14.0460	19.6450		16.8455
Downwind outside West.....	1.3171	1.1533		1.2352
Background outside East...	0.3800	0.7090	0.4300	0.5063
Difference...Downwind minus Background.....				0.7289
Difference/Inside = Percent of dust that reaches ambient air..				4.33%

IF YOU ASSUME:

1 - That the inlet of the baghouse = Inside the grinding plant

2 - That the calculations for the percent of dust that reaches ambient air is correct

THEN:

The PM emission from the grinding plant is 4.33% of the emission factor of 8.5 #/ton

or 8.5 X 0.0433 = 0.368 #/ton

THEREFORE: THE CORRECT EMISSION FACTOR IS.....0.368 #/ton

Prepared by:

John C. Jensen
Environmental Engineer
THE BELDEN BRICK COMPANY

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