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BRICK

5100 Brickyard Road
Columbia, South Carolina 29203
meridianbrick.com

August 24, 2018

U.S. Environmental Protection Agency
Attention: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

RE: Meridian Brick LLC Request for Extension of Compliance with Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing)

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date. The current compliance date for the above referenced NESHAP is December 26, 2018.

As such, enclosed are compliance date extension requests for the following Meridian Brick LLC facilities:

Meridian Brick LLC – Elgin Facility
Meridian Brick LLC – Michigan Plant
Meridian Brick LLC – Terre Haute Plant
Meridian Brick LLC – Muskogee Plant
Meridian Brick LLC – Mineral Wells East Facility

Upon review, should you have any questions, please do not hesitate to contact me at 803-691-3121 or david.mckeown@meridianbrick.com.

Sincerely,

J. David McKeown
Environmental Manager

Request for Extension of Compliance
40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants
Brick and Structural Clay Products Manufacturing Source Category

I. General Information

A. Facility Information

Facility Name:		Meridian Brick LLC – Terre Haute Plant
Facility Street Address:		5601 East Price Drive, Terre Haute, Indiana 47802
Facility Local Contact:	Name:	David McKeown
	Title:	Environmental Manager
	Address:	5100 Brickyard Road, Columbia, SC 29203
	Phone:	803-691-3121
Operating Permit Number:		167-39297-00139
Facility I.D. Number:		Master Agency Interest ID 14608
Responsible Official:	Name:	Paul Samples
	Title:	CEO
	Address:	6455 Shiloh Road, Suite D Alpharetta, Georgia 30005

B. Indicate the relevant standard or requirement for which you request a compliance extension:

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

II. Timeliness of Request

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or

☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.

III. Eligibility

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a "synthetic minor" or "area" source.

IV. Compliance Schedule Information

A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

OPTION 1: This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

X **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility plans to submit an application for any required permits by October 1, 2018

   ☒ Yes ☐ No

2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of

emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). *If no permits are required for such action*, the facility will initiate the activities as applicable by the dates specified below:

☐ On-site construction Date:

☐ Installation of controls Date:

☐ Process change Date:

☐ Application for _____ Date:

Comments: Permits are required

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

   Comments:

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

   Date: Prior to December 26, 2019.

   Comments:

C. You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.

V. Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type): Paul Samples
Title: CEO

Signature of Responsible Official: _____

Date: 8/23/18