STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL COMMISSION

In the matter of administrative proceedings against NEW HAVEN FOUNDRY, INC., a corporation organized under the laws of the State of Michigan and doing business at 58391 Main Street, City of New Haven, County of Macomb, State of Michigan.	APC No. 12-1980

STIPULATION AND FINAL ORDER

This proceeding resulted from allegations by the staff of the Air Quality Division of the Department of Natural Resources (hereinafter referred to as the "Staff"). The Staff alleges that New Haven Foundry, Inc., a Michigan corporation (hereinafter referred to as the "Company"), located at 58391 Main Street, City of New Haven, County of Macomb, State of Michigan, is violating the allowable limits as established by Administrative Code 1980 AACS, R 336.1301, R 336.1331, and R 336.1901 and is in violation of the National Ambient Air Quality Standards.

The parties agree to the termination of this proceeding by entry of a Final Order by consent.

The parties agree as follows:

1. The New Haven Foundry is located in an area that the Michigan Air Pollution Control Commission has classified as a nonattainment area for particulate in accordance with Section 107 of the Federal Clean Air Act as amended in 1977.

2. The termination of this matter of a Final Order by consent is proper and acceptable.

3. The signing of this Stipulation is for settlement purposes only and does not in any way or in any manner whatsoever constitute or represent an admission by the Company

that any law, rule, regulation, order, or guideline has been or is being violated. The parties agree that the particulate emissions from the Company's facilities should be abated. The Company shall achieve compliance with the aforementioned regulations in accordance with the following schedule:

A. CUPOLA EMISSION CONTROL PROGRAM:

(1) By the effective date of this Order, the Company shall have replaced the defective blast air gates on both cupolas to minimize air leakage.

(2) After the effective date of this order, the Company shall maintain all blast air gates in good repair.

(3) After the effective date of this order, the Company shall limit the blast air rate such that cupola emissions do not bypass the scrubber.

(4) By the effective date of this Order, the Company shall have modified, consistent with safe design and operating practice, the inlet damper to the emission control system to provide a positive minimum gas flow into the emission control system during times when the blast air is being bypassed.

(5) After the effective date of this Order, the meltdown plug shall be placed in the lowered or covering position at any time when the Company has stopped charging a cupola and the material in the cupola has been reduced to a level that would allow emissions to bypass the primary cupola control system.

(6) After the effective date of this Order, the Company shall maintain at the foundry one complete set of spare parts for the cupola plug crane.

(7) By the effective date of this order, the Company shall have installed a permanent manometer or equivalent device to measure the operating pressure drop across the venturi scrubber.

(8) By the effective date of this order, the Company shall have repaired the venturi throat adjusting mechanism and shall thereafter keep it in good repair.

(9) By December 31, 1982, the Company shall have installed a carbon monoxide monitoring system to indicate the carbon monoxide concentration in the cupola exhaust gas.

(10) By the effective date of this Order, the Company shall have installed a television monitoring system to view the emissions from the cupolas.

(11) After the effective date of this Order, visible emissions from the cupolas shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(12) After the effective date of this Order, the particulate emission rate from each cupola shall not exceed 0.7 pounds of particulate per ton of metal charged.

B. FINAL CUPOLA EMISSION CONTROL PROGRAM

(1) After the effective date of this Order upon notification by Staff that emissions from the cupolas violate the emission limits specified in either paragraphs 3.A(11) or 3.A(12), above, the Company shall, within 60 days of that notification, advise Staff in writing of their selection of one of the following two alternative time schedules for bringing emissions from the cupolas into compliance. Thereafter, the Company shall comply with the time schedule specified for the chosen alternative.

(2) ALTERNATE A: If alternate A is chose by the Company pursuant to paragraph 3.B(1), above, the Company shall replace the existing cupola emissions control system with a new emissions control system according to the following time schedule:

(a) Within six (6) months of the Staff notification referred to in paragraph 3.B(1), the Company shall submit to Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the new air pollution control device(s)

and/or other equipment to be used to control the particulate emissions from the cupolas to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.A(11) and 3.A(12).

(b) Within six (6) months of the Staff notification referred to in paragraph 3.B(1), the Company shall submit to Staff evidence to substantiate that the required new air pollution control device(s) and/or other equipment referred to in paragraph 3.B(2)(a) have been placed on order with the manufacturer.

(c) Within fourteen (14) months of the Staff notification referred to in paragraph 3.B(1), and after receiving the installation permit referred to in paragraph 3.B(2)(a), above, the Company shall begin on-site installation of said new air pollution control device(s) and/or other equipment referred to in paragraphs 3.B(2)(a) and 3.B(2)(b) , above, and notify Staff in writing that this installation has begun.

(d) Within twenty-four (24) months of the Staff notification referred to in paragraph 3.B(1), the Company shall have placed in operation said new air pollution control device(s) and/or other equipment referred to in paragraphs 3.B(2)(a), 3.B(2)(b), and 3.B(2)(c), above, and notify Staff in writing that the device(s) and/or equipment have been placed in operation.

(e) Within twenty-eight (28) months of the Staff notification referred to in paragraph 3.B(1), the Company shall complete the testing (conducted according to procedures approved by Staff) of said new air pollution control device(s) and/or other equipment referred to in paragraphs 3.B(2)(a), 3.B(2)(b), 3.B(2)(c), and 3.B(2)(d), above, and submit to Staff the detailed report of the test data and results.

(3) ALTERNATE B: If Alternate B is chosen by the Company pursuant to paragraph 3.B(1), above, the Company shall permanently discontinue operation of the existing cupolas by July 1, 1983, or within thirty (30) months of the Staff notification referred to in paragraph 3.B(1), above, whichever provides more time.

C. TUMBLEBLAST AND CLEANING ROOM SCRUBBER:

(1) By the effective date of this Order, the Company shall submit to Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to control the particulate emissions from the tumbleblast to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.C(4) and 3.C(5).

(2) By the effective date of this Order, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in Paragraph 3.C(1), above, and notify Staff in writing that the device(s) and/or equipment have been placed in operation.

(3) By the effective date of this Order, the Company shall complete testing (conducted according to procedures approved by staff) of said air pollution control device(s) and/or other equipment referred to in paragraphs 3.C(1) and 3.C(2), above, and submit to Staff the detailed report of the test data and results, unless a written waiver of this testing requirement has been received from Staff.

(4) After the effective date of this Order, visible emissions from the tumbleblast shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(5) After the effective date of this Order, the particulate emission rate from the tumbleblast shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis.

(6) By the effective date of this Order, the Company shall have installed a float type water level control system to maintain proper water level in the Cleaning Room Scrubber and shall thereafter maintain the proper water level in the Cleaning Room Scrubber.

D. CORE SAND MULLER

(1) By the effective date of this Order, the Company shall submit to Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to control the particulate emissions from the Core Sand Muller to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.D(5) and 3.D(6).

(2) By the effective date of this Order, the Company shall submit to Staff evidence to substantiate that the required air pollution control device(s) and/or other equipment referred to in paragraph 3.D(1), above, have been placed on order with the manufacturer.

(3) By October 1, 1980, and after receiving the installation permit referred to in paragraph 3.D(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 3.D(1) and 3.D(2), above, and notify Staff in writing that this installation has begun.

(4) By November 1, 1980, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 3.D(1), 3.D(2), and 3.D(3), above, and notify Staff in writing that the device(s) and/or equipment have been placed in operation.

(5) After November 1, 1980, visible emissions from the Core Sand Muller shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(6) After November 1, 1980, the particulate emission rate from the Core Sand Muller shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry-gas basis.

E. CORE SAND BINS

(1) By August 15, 1980, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to control the particulate emissions from the Core Sand Bins to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.E(5) and 3.E(6).

(2) By January 1, 1981, the Company shall submit to the Staff evidence to substantiate that the required air pollution control device(s) and/or other equipment referred to in paragraph 3.E(1), above, have been placed on order with the manufacturer.

(3) By June 1, 1981, and after receiving the installation permit referred to in paragraph 3.E(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 3.E(1) and 3.E(2), above, and notify the Staff in writing that this installation has begun.

(4) By November 1, 1981, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 3.E(1), 3.E(2), and 3.E(3), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(5) After December 1, 1981, visible emissions from the Core Sand Bins shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(6) After December 1, 1981, the particulate emission rate from each Core Sand Bin shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry-gas basis.

F. CASTING SORTING CONVEYOR AND SPRUE DUMP

(1) By the effective date of this Order, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to control the particulate emissions from the Sprue Dump to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.F(6) and 3.F(7) and describing the modifications to be made to the casting sorting conveyor to provide for the separation of sand from the casting during shakeout.

(2) By the effective date of this Order, the Company shall have completed the modifications to the casting sorting conveyor referred to in paragraph 3.F(1), above, to provide for the separation of sand from the casting during shakeout.

(3) By the effective date of this Order, the Company shall submit to the Staff evidence to substantiate that the required air pollution control device(s) and/or other equipment referred to in paragraph 3.F(1), above, have been placed on order with the manufacturer.

(4) By October 1, 1980, and after receiving the installation permit referred to in paragraph 3.F(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 3.F(1) and 3.F(3), above, and notify the Staff in writing that this installation has begun.

(5) By December 1, 1980, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 3.F(1), 3.F(3), and 3.F(4), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(6) After December 1, 1980, visible emissions from the Sprue Dump shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(7) After December 1, 1980, the particulate emission rate from the Sprue Dump shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry-gas basis.

G. HORIZONTAL CORE BAKING OVENS:

HORIZONTAL CORE BAKING OVEN NUMBER 3

(1) By the effective date of this Order, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the equipment to be used to replace horizontal core baking oven No. 3 to obtain compliance with the Commisison's rules and the visible emission limit specified in paragraph 3.G(5).

(2) By the effective date of this Order, the Company shall submit to the Staff evidence to substantiate that the required equipment referred to in paragraph 3.G(1), above, has been placed on order with the manufacturer.

(3) By the effective date of this Order, and after receiving the installation permit referred to in paragraph 3.G(1), above, the Company shall begin on-site installation of said equipment referred to in paragraphs 3.G(1) and 3.G(2), above, and notify the Staff in writing that this installation has begun.

(4) By the effective date of this Order, the Company shall have placed in operation said equipment referred to in paragraphs 3.G(1), 3.G(2), and 3.G(3), above, and notify the Staff in writing that the equipment has been placed in operation.

(5) After the effective date of this Order, visible emissions from the equipment referred to in paragraphs 3.G(1) 3.G(2), 3.G(3), and 3.G(4), above, shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(6) After the effective date of this Order, the Company shall not operate horizontal core baking oven No. 3 at the foundry.

HORIZONTAL CORE BAKING OVEN NUMBER 2

(7) By April 1, 1982, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the equipment to be used to replace horizontal core baking oven No. 2 to obtain compliance with the Commission's rules and the visible emission limit specified in paragraph 3.G(11).

(8) By July 1, 1982, the Company shall submit to the Staff evidence to substantiate that the required equipment referred to in paragraph 3.G(7), above, has been placed on order with the manufacturer.

(9) By November 1, 1982, and after receiving the installation permit referred to in paragraph 3.G(7), above, the Company shall begin on-site installation of said equipment referred to in paragraphs 3.G(7) and 3.G(8), above, and notify the Staff in writing that this installation has begun.

(10) By December 31, 1982, the Company shall have placed in operation said equipment referred to in paragraphs 3.G(7), 3.G(8), and 3.G(9), above, and notify the Staff in writing that the equipment has been placed in operation.

(11) After December 31, 1982, visible emissions from the equipment referred to in paragraphs 3.G(7), 3.G(8), 3.G(9), and 3.G(10), above, shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(12) After December 31, 1982, the Company shall not operate horizontal core baking oven No. 2 at the foundry.

HORIZONTAL CORE BAKING OVEN NUMBER 1

(13) By April 1, 1984, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the equipment to be used to replace horizontal core baking oven No. 1 to obtain compliance with the Commission's rules and the visible emission limit specified in paragraph 3.G(17).

(14) By July 1, 1984, the Company shall submit to the Staff evidence to substantiate that the required equipment referred to in paragraph 3.G(13), above, has been placed on order with the manufacturer.

(15) By November 1, 1984, and after receiving the installaiton permit referred to in paragraph 3.G(13), above, the Company shall begin on-site installation of said equipment referred to in paragraph 3.G(13 and 3.G(14), above, and notify the Staff in writing that this installation has begun.

(16) By December 1, 1984, the Company shall have placed in operation said equipment referred to in paragraphs 3.G(13, 3.G(14), and 3.G(15), above, and notify the Staff in writing that the equipment has been placed in operation.

(17) After December 31, 1984, visible emissions from the equipment referred to in paragraphs 3.G(13), 3.G(14), 3.G(15), and 3.G(16), above, shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(18) After December 31, 1984, the Company shall not operate horizontal core baking oven No. 1 at the foundry.

H. EAST AND WEST SHOT BLAST BAGHOUSES REPLACEMENT: The Company shall replace the East and West Shot Blast Baghouses in accordance with the following schedule:

(1) By October 1, 1980, the Company shall submit to the Staff, pursuant to the Commission's rules, acceptable plans and specifications and an application for an installation permit describing the new air pollution control device(s) and/or other equipment to be used to control the particulate emissions from the East and West Shot Blast to obtain compliance with the Commission's rules and the emission limits specified in paragraphs 3.H(5) and 3.H(6).

(2) By March 1, 1981, the Company shall submit to the Staff evidence to substantiate that the required new air pollution control device(s) and/or other equipment referred to in paragraph 3.H(1), above, have been placed on order with the manufacturer.

(3) By September 1, 1981, and after receiving the installation permit referred to in paragraph 3.H(1), above, the Company shall begin on-site installation of said new air pollution control device(s) and/or other equipment referred to in paragraphs 3.H(1) and 3.H(2), above, and notify the Staff in writing that this installation has begun.

(4) By December 1, 1981, the Company shall have placed in operation said new air pollution control device(s) and/or other equipment referred to in paragraphs

3.H(1), 3.H(2), and 3.H(3), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(5) After December 31, 1981, visible emissions from the East and West Shot Blast shall not exceed 20 percent opacity except as specified in R 336.1301, paragraphs 1(a) and 1(b).

(6) After December 31, 1981, the particulate emission rate from the East and West Shot Blast each shall not exceed 0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry-gas basis.

(7) After the effective date of this Order, the Company shall maintain the existing East and West Shot Blast Baghouses in optimum operating condition until those baghouses have been replaced pursuant to the schedule specified in paragraphs 3.H(1), 3.H(2), 3.H(3), and 3.H(4), above. The Company shall also maintain an adequate supply of replacement bags for each baghouse.

I. OUTDOOR MAGNETIC SEPARATION AREA:

After May 1, 1980, and upon notification by Staff that fugitive dust emissions from the Outdoor Magnetic Separation Area continue to be excessive, the Company shall, within 60 days of such notification, submit to Staff an acceptable program and timeschedule for controlling these emissions as expeditiously as practical.

J. FUGITIVE DUST CONTROL PROGRAMS

(1) After the effective date of this order, plant yard surfaces shall be maintained in as dust-free condition as practical through daily sweeping of all paved surfaces by wetted brush or vacuum sweepers. The collected dust shall be promptly removed and disposed of in a manner to minimize introduction of contaminants to the ambient air.

(2) After the effective date of this order, regular applications of dust suppressants shall be provided on unpaved roadways a minimum of four times per year, or more, if needed, as determined by Staff.

(3) After the effective date of this order, vehicular traffic in the yard area and plant roadways shall be regulated to reasonable speeds necessary to minimize dust generation under dry surface conditions.

(4) After the effective date of this order, vehicles hauling granular material, except slag, shall be covered with firmly secured canvas or a similar type covering.

(5) After the effective date of this order, plant roofs shall be cleaned by removal of accumulated particulate on at least a monthly basis, and by removing and disposing of collected material in a manner so as to minimize the introduction of contaminants to the ambient air.

K. GENERAL MALFUNCTION ABATEMENT PLAN

(1) After the effective date of this Order, the Company shall maintain all existing emission control systems in good repair and in optimum operating condition.

(2) By the effective date of this Order, the Company shall submit and implement an acceptable malfunction abatement plan (hereinafter referred to as the "Plan"), which shall set forth procedures for the prevention, detection, and correction of malfunctions or failures of all identified major air cleaning devices at the foundry. The Plan shall consist of the following:

(a) A preventative maintenance program consisting of:

(i) Identification by Company job title of the individual(s) responsible for implementation of the Plan.

(ii) A description of and the schedule of inspections and maintenance operations to be conducted.

(iii) Identification of replacement parts and quantities to be kept in inventory. These parts and supplies shall be replenished promptly as used.

(b) A malfunction or failure detection program, consisting of:

(i) Identification by Company job title of the individual(s) responsible for implementation of the malfunction or failure detection plan.

(ii) An identification of the source and air cleaning device operating variables that will be monitored.

(iii) The normal operating range of these variables.

(iv) A description of the monitoring procedures and frequencies.

(c) A description of the corrective procedures that will be taken in the event of a malfunction or failure, including the minimum time required for these corrections, in order to achieve compliance with the Commission's rules.

(3) After the effective date of this Order, the Company shall maintain records necessary for determining compliance with the Plan. The form of such records shall be determined by the Company and such records shall be maintained for a period of six (6) months. If excessive emissions, lasting more than one (1) hour occur as a result of a malfunction or failure of an identified major air cleaning device, the Company shall:

(a) Notify the Staff by telephone no later than the next working day.

(b) Submit to the Staff, in writing, within ten (10) days, a detailed report, including probable causes, duration of violation, remedial action taken, and what steps are being undertaken to prevent a reoccurrence. These preventative steps shall become a part of the Plan.

L. CUPOLA MALFUNCTION ABATEMENT PLAN

(1) The Cupola Malfunction Abatement Plan shall meet all requirements listed in Paragraph K.

(2) After the effective date of this order, the Company shall follow the following procedures whenever a cupola emission control system malfunction or failure occurs. A cupola emission control system malfunction or failure (hereinafter "malfunction") shall be defined for the purposes of this paragraph as an operation of any of the control systems outside normal operating ranges for such system variables as venturi pressure drop, exhaust gas flow rate, collector water level, collector water flow rate and gas temperature, or the presence of visible emisions from the top of the cupola. Normal operating ranges for these or other measured process variables shall be supplied to Staff by the time of entry of this order.

(a) Immediately initiate an investigation to identify the cause of the malfunction.

(b) If as a result of the investigation carried out pursuant to paragraph 3.L(2)(a), above, the Company cannot identify the cause of the malfunction within thirty (30) minutes after the commencement of malfunction, the Company shall cease charging iron to the cupola and immediately initiate complete shutdown of the cupola. Such shutdown procedures shall be completed within 90 minutes.

(c) If as a result of the investigation carried out pursuant to paragraph 3.L(2)(a), above, the Company does identify the cause of the malfunction within thirty (30) minutes after the commencement of the malfunction, the Company shall either:

(i) Implement corrective measures and correct the malfunction within two (2) hours after identifying the cause of the malfunction; or

(ii) Immediately cease charging iron to the cupola and immediately initiate complete shutdown of the cupola. This shutdown of the cupola shall be completed within 90 minutes after the cause of the malfunction has been identified.

(d) If the Company is implementing corrective measures pursuant to paragraph 3.L(2)(c)(i), above, all charging of iron to the cupola shall cease and all cupola air blasting shall cease except as necessary to protect process equipment or to allow partial burn down as needed to allow safe start-up. The provisions of this paragraph shall apply until the completion of the corrective measures and until the malfunction has been corrected.

4. The Company acknowledges that fugitive dust control rules have been proposed by Staff pursuant to requirements of the Federal Clean Air Act Amendments of 1977 which may require fugitive dust abatement measures in addition to those required by Paragraphs I and J. The Company further acknowledges that nothing in this order shall preclude them from complying with any fugitive dust control rules which may be adopted by the Commission or from implementing additional fugitive dust control measures that may be needed to provide for compliance with the National Ambient Air Quality Standards.

5. This Order is not regarded as a variance subject to the 12-month limitation specified in Section 22 of the Air Pollution Act, 1965 PA 348, MCLA 336.32; MSA 14.58(22). Approval of this Order is not a major state action for purposes of further environmental review pursuant to Executive Order 1974-4.

6. A public hearing on this Order was held on July 15, 1980. The parties consent to enforcement of this Stipulation and Final Order in the same manner as for all final orders entered pursuant to Section 16 of the Air Pollution Act; 1965 PA 348; MCLA 336.26; MSA 14.58(16), including enforcement pursuant to 1970 PA 127, MCLA 691.1201 et. seq.; MSA 14.528(201) et. seq.

Approved:

Michael B. Garos

NEW HAVEN FOUNDRY, INC.

Dated: July 25, 1980

Approved as to Content:

Robert Miller

Robert P. Miller, Acting Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Dated: Aug 1 - 1980

Approved as to Form:

Stewart H. Freeman

Stewart H. Freeman
Assistant Attorney General
DEPARTMENT OF ATTORNEY GENERAL

Dated: August 12, 1980

FINAL ORDER

This Commission having had opportunity to review the above stated Stipulation for Entry of Consent Order, and this Commission having authorized the Chief of the Air Quality Division of the Department of Natural Resources as agent of the Commission to enter into consent orders,

IT IS ORDERED that this Consent Order shall be entered in the record of this Commission as stated herein.

AIR POLLUTION CONTROL COMMISSION

By: Robert P. Miller

Robert P. Miller, Acting Chief
Air Quality Division
Department of Natural Resources

Dated: Aug 17, 1988