

**Response to Comments on Draft Revisions to
AP-42 Chapter 11, Section 7 – Ceramic Products Manufacturing**

May 2025

On October 18, 2024, the EPA posted draft revisions to AP-42 Chapter 11, Section 7 – Ceramic Products Manufacturing, which included new and revised emission factors. The EPA provided a 60-day public review period of the revisions which ended on December 17, 2024. The EPA received one comment.

Commenter: Jill Inahara, jill.inahara@deq.oregon.gov

Comment: I saw that you are updating the emission factors for this industry. The testing for the HCl, mercury, dioxins and furans was done on tunnel kilns. If the source doesn't have tunnel kilns, can I assume these emission factors would not apply? It would be helpful if you clarified that those emission factors are for tunnel kilns on the table.

Response: The emission factors only apply to tunnel kilns. It is true that if a source does not have a tunnel kiln, the new emission factors do not apply. In Table 11.7.1, the updated emission factor for PM is for Firing--natural gas-fired kiln (SCC 30500850). The SCC 30500850 is specific for Industrial Processes, Mineral Products, Clay Ceramics Manufacture, Tunnel Kiln: Natural Gas-fired. We added the word 'tunnel' to the description in the table.