ADEQ
RENEWAL
OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation No. 26:

Permit No. : 1154-AOP-R1

Renewal #1

IS ISSUED TO: Acme Brick Company – Perla Plant

Malvern, AR 72104

Hot Springs County

AFIN: 30-00008

and

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

AND

IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith Michaels

Date

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Table 1 - List of Acronyms

A.C.A.	Arkansas Code Annotated
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound per hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate matter
PM_{10}	Particulate matter smaller than ten microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur dioxide
SSM	Startup, Shutdown, and Malfunction Plan
tpy	Tons per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Section I: FACILITY INFORMATION

PERMITTEE:	Acme Brick Company – Perla Plant
AFIN:	30-00008
PERMIT NUMBER:	1154-AOP-R1
FACILITY ADDRESS:	US Highway 67 North Malvern, AR 72104
MAILING ADDRESS	US Highway 67 North Malvern, AR 72104
COUNTY:	Hot Springs
CONTACT POSITION:	Scott Farrar / Tom Poston – Plant Manager
TELEPHONE NUMBER:	(501) 337-4407
REVIEWING ENGINEER:	Karen Cerney
UTM North - South (Y):	Zone 15 [3802.6]
UTM East - West (X):	Zone 15 [520.2]

Section II: INTRODUCTION

Summary of Permit Activity

Acme Brick Company owns and operates a clay brick manufacturing facility located on Hwy 67 North in Malvern, Arkansas. This facility manufactures hard fired clay brick for use in the construction of commercial, residential, and architectural structures. There are two separate brick manufacturing operations at the Perla facility, Eastgate and Westgate, which were constructed in 1968 and 1978 respectively. This Title V permit renewal and modification changes one source (SN-09) from an insignificant activity (Group C Number 5) to a permitted emission source, it redistributes the current annual production rate between the two plants, and it updates emissions factors for the rotary kiln and rotary drier based on current stack test data. The Westgate kiln will have a production rate of 87,599 tons per year (tpy) of fired ware, and the Eastgate kiln will have a production rate of 137,841 tpy of fired ware. The proposed changes result in an increase of 8.3 tpy of SO_2 emissions, 8.1 tpy of NO_x emissions, and 2.3 tpy of VOC emissions and a decrease of 4.4 tpy of CO emissions, 0.06 tpy of HF emissions, 0.42 tpy of HCl emissions, and 5.0 tpy of PM emissions.

Process Description

Acme's two operations supply different brick markets. Perla Eastgate operation typically manufactures brick for the architectural market, and the Perla Westgate operation supplies the residential and small architectural buildings market. The major difference between the architectural and residential brick is the color applications. Architectural production consists of adding pigments to the clay body; while residential production normally uses wet slurries and dry coatings that are applied to the surface of the brick. The grinding and sizing operations supply ground raw materials to both operations. Each operation has its own individual extrusion, drying, firing, and packaging operations.

Grinding and Sizing

Acme's clay raw material sources are local clays mined from pits located within a few miles of the Perla Plant site. The clay is surface mined and deposited in stockpiles. Acme has two primary clay body mixes in use at the Perla facility. One is a white firing clay body and the other is a buff firing clay body. Acme constructs stockpiles each year of the primary clay body mixes. Each stockpile is constructed with sand to aid in drying and firing. The white body stockpile contains sand from the Perla mines and the buff stockpile has an addition of red alluvial sandy clay from a mine located along the Ouachita River bottom.

The clay is hauled from the stockpiles to the primary crusher by scrapers or trucks. The stockpiling construction and the hauling of the clay to the primary crusher creates a fugitive dust emission on the haul roads. This emission is controlled by periodic water application as needed.

The clay is ground at the primary crusher. The clay will average approximately 15% moisture by weight at this point. The primary crusher is located underground beneath a hopper.

The secondary crusher is mounted 15 feet above ground level. The secondary crusher reduces the clay to two inches or less maximum size. The fugitive emissions from these crushers are held to a minimum due to the high moisture content of the clay.

The clay is conveyed from the secondary crusher to an overhead conveyor in a clay storage area. The primary clay body mixes are stored in separate locations and there is a several day supply of each in this area. The clay storage area is covered to provide a reliable source of consistent moisture clay. The clay is discharged from the overhead conveyor into a series of bays with concrete wall dividers. The clay is loaded by a front end loader from the clay storage area into proportioning feeders which begin the final grinding and sizing operations. The clay progresses from the feeders to the hammermills and finally to a screening area.

The final grinding and sizing operation contains several hammermills. Each mill has parallel shafts that rotate in the opposite directions and into each other. The shafts contain replaceable rotors and hammers. After the clay is ground, it is then conveyed to sizing screens, where any oversized material is segregated and returned for resizing. The emissions from this process are captured by a dust collector. This unit operates at 99+% efficiency and has no point source discharge outside of the grinding and storage facility.

The raw material needs a non-plastic (non-clay) material that will 'open' the clay body up during the drying and firing process. These non-plastics give the moisture from the internal part of the brick an avenue to the surface of the brick. The brick will crack during the drying process if the steam cannot escape. The sand additions to the stockpile are one of the non-plastics. The bricks also need additional amounts of a non-plastic that is larger in plastic size. The facility has several sources for this material. One is kaolin clay that is used in the stockpile. This clay is sized through the primary and secondary crushers and then is fired through the rotary kiln (SN-10). This material is also introduced to the final grinding and sizing operations through proportioning feeders.

The other source of non-plastic material range from purchased aggregate material to crushed recycled fired brick. These brick may or may not meet quality standards at the end of the manufacturing process and are recycled to a two inch size through a jaw crusher. This material is introduced to the final grinding and sizing through feeders.

On certain blends of brick, sand is added. This sand provides an excellent fluxing agent during our firing process as well as providing some color pigmentation. This sand must be dried before it can be used in the process. A rotary sand dryer (SN-09) is used for drying this material.

Both the rotary kiln and rotary dryer are six foot diameter tubular kilns that introduce the material at one end and feed toward the natural gas burner at the other end. Both kilns pull the exhaust gases through a velocity reduction tank with water sprays that help reduce particulate emissions.

The grinding and sizing operations supply both plants with their ground raw materials.

Extrusion

The raw material is conveyed from the grinding operations to screw auger extruders. This clay is extruded through a die and cut to size. Automatic heads set the brick onto refractory kiln cars. Eastgate often adds the following types of materials to the clay raw material as coloring additives before extrusion: manganese dioxide and iron chromite. The Westgate operation applies surface coatings to the brick surface after extrusion. The following types of materials are used as dry coating at Westgate: red iron oxide, manganese dioxide, perla clay, penn sand, and alluvial sand. The dry applications area is enclosed and dust collectors are installed to capture any emissions at their point of origin. These systems have no point source outside of the building. After the brick are sized and coated, brick are stacked on refractory kiln cars and proceed to the drying process.

Drying

The kiln cars proceed into a surge holding area before entry into the dryer. The extrusion process will normally manufacture brick less than 7 days per week. The drying and firing process are continuous operations that accept brick 7 days per week. The brick need a controlled humidity holding area before being introduced to the drying process. The brick progresses from the holding area to the dryer where the majority of the moisture is removed from the clay. Neither operation requires an emission source from its holding area. The temperature in the holding area is maintained by waste heat from the tunnel kiln or dryer.

The brick at both operations then leave the holding areas and proceed into the dryers. The dryers are counter flow heat exchangers. The kiln cars travel at a continuous rate through the dryers. The heat source is waste heat from the cooling zone of the tunnel kiln. This heat is introduced at the exit of the dryer and travels opposite the flow of the brick. This air movement is accomplished by large exhaust fans at the entrance of each dryer. These fans pull the heat from the exit to the entrance and results in optimum drying conditions. Temperatures and humidity are controlled by recirculation and ambient air input points throughout the length of the dryer.

The operations have various combinations of tunnel dryers and exhaust emission fans. The Eastgate operation has four tunnel dryers but only two exhaust fans. Tunnel dryers # 1 and 2 share the same exhaust fan (SN-12). Tunnel dryers # 3 and 4 share the same exhaust fan (SN-13). The Westgate operation has two tunnels dryers that share one exhaust fan (SN-17).

Firing

Both the Eastgate and Westgate plants have tunnel kilns for their firing processes. These kilns are continuous operations. The various zones in the tunnel kilns maintain desired temperature setpoints while the brick travel through these zones.

The firing portion of the tunnel kilns are also counter flow heat exchangers. The combustion gases introduced into the kiln by high velocity burners are pulled opposite the direction of brick

travel through the tunnel kiln. The firing zone of the tunnel kilns are approximately 2/3 the length of the kiln from the entrance end.

The cooling zone begins at the end of the firing zone. A neutral pressure exists at this point. The combustion gases at the end of the firing zone are pulled toward the entrance by the exhaust fan. The ambient air introduced for rapid cooling at the start of the cooling zone is pulled the other direction by the dryer supply fan. This fan supplies the dryers with their heat source. The product quality is severely affected if products of combustion are pulled toward the cooling zone and dryer. The combustion products will stain the brick in the drying process and this stain will not be totally removed during firing.

The emission points for the kilns are their exhaust fans. The Eastgate exhaust fan is SN-14; the Westgate kiln exhaust is SN-18.

Packaging

After the brick are fired, they are offloaded from the kiln cars and packaged into cubes. These cubes can be transported by forklifts to storage areas where they will await shipment. Bricks are shipped from the plant to construction sites by two predominant methods, over the road trucks and rail.

Regulations

The following table contains the regulations applicable to this permit.

Table 2 - Regulations

Source No.	Regulation Citations
Facility	Regulation 18, Arkansas Air Pollution Control Code.
Facility	Regulation 19, Regulations of The Arkansas Plan of Implementation for Air Pollution Control
Facility	Regulation 26, Regulations of The Arkansas Operating Air Permit Program
SN-14*	40 CFR Part 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing

* Acme Brick Company – Perla Plant must submit, no later than 180 days prior to the effective date, a permit application which brings the facility into full compliance with the subpart.

The following table is a summary of emissions from the facility. The following table contains cross-references to the pages containing specific conditions and emissions for each source. This table, in itself, is not an enforceable condition of the permit.

Table 3 – Emission Summary

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
Total Allowable Emissions		PM	22.4	67.5	
		PM_{10}	22.4	67.5	
		SO_2	60.2	168.1	
		VOC	2.7	5.6	
		CO	22.0	85.2	
		NO_x	22.2	50.4	
HAPs		HF	5.25	21.75	
		HCL	1.41	5.80	
09	Rotary Dryer	PM/PM_{10}	3.9	1.4	14
		SO_2	7.0	3.5	
		CO	1.0	0.4	
		NO_x	4.0	2.1	
		VOC	0.6	0.3	
		HF	0.07	0.04	
		HCL	0.03	0.01	
10	Rotary Kiln	PM/PM_{10}	3.9	10.5	17

Emission Summary					
			Emission Rates		
Source No.	**Description**	**Pollutant**	**lb/hr**	**tpy**	**Cross Reference Page**
		SO_2	7.0	26.6	
		CO	1.0	3.0	
		NO_x	4.0	16.2	
		VOC	0.6	2.0	
		HF	0.07	0.29	
		HCL	0.03	0.10	
12, 13, and 17	Dryer Fan Stacks	PM/PM_{10}	9.5	36.7	20
		SO_2	18.2	47.8	
		CO	4.0	17.2	
		HF	0.27	0.79	
14 and 18	Tunnel kilns	PM/PM_{10}	5.1	18.9	22
		SO_2	28.0	90.2	
		CO	16.0	64.6	
		NO_x	14.2	32.1	
		VOC	1.5	3.3	
		HF	4.84	20.63	
		HCL	1.35	5.69	

Section III: PERMIT HISTORY

Air permit #1154-A was the initial State Implementation Plan (SIP) permit issued under the current numbering system to Acme Brick Company's Perla plant in Perla, Arkansas. The permit was issued on May 7, 1991 for the permitting of a hard fired clay brick manufacturing facility. This facility had previously been permitted under two air permits. These were Air Permit No. 281-AR-1 which authorized the burning of pine sawdust and bituminous coal in the on-site rotary kilns, and Air Permit No. 393-A which permitted the use of No. 2 fuel oil for the eight brick dryers/kilns. This permit (1154-A) voided and superseded the previous permits, and covered all emission points located at this facility.

Air permit #1154-AR-1 was issued to Acme Brick Company's Perla plant on September 30, 1992. The air permit was modified by incorporating on-site stack test data which increased the permitted levels of sulfur dioxide, carbon monoxide, and fluoride emissions from the facility.

Air permit #1154-AR-2 was issued to Acme Brick Company's Perla plant on May 20, 1996. The air permit was modified by incorporating the results of the latest on-site stack test data which decreased the particulate emissions but increased the sulfur dioxide emissions from the facility. The air permit was also modified by the installation of a high efficiency (99.9%) dust collection system in the grinding building and the discontinuation of several operations at the facility.

Arkansas operating permit #1154-AOP-R0 is the first operating permit issued to Acme Brick Company - Perla Plant under Regulation 26. The facility modified their existing air permit by increasing the total annual brick production and removing nine sources (SN-09, SN-29, SN-30, SN-31, SN-32, SN-33, SN-34, SN-35, and SN-36) by defining them as insignificant under Regulation 19 Appendix A, Group C, Number 5.

Section IV: SPECIFIC CONDITONS

Source No. SN-09 Description

Source SN-09 is the rotary dryer. The rotary dryer is a six foot diameter tubular kiln that introduces the material at one end and feeds the material toward the natural gas burner at the other end. The dryer pulls the exhaust gases through a velocity reduction tank with water sprays that help reduce particulate matter. The equipment was installed in 1968.

Specific Conditions

1. The permittee allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by Specific Condition 5. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 4 – Maximum Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
09	PM_{10}	3.9	1.4
	SO_2	7.0	3.5
	VOC	0.6	0.3
	CO	1.0	0.4
	NO_X	4.0	2.1

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by Specific Condition 5. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 5 – Maximum Non-Criteria Emission Rates

Source No.	Pollutant	lb/hr	tpy
09	PM	3.9	1.4
	HF	0.07	0.04
	HCL	0.03	0.01

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

Table 6 – Visible Emissions

SN	Limit	Regulatory Citation
09	20%	§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E

4. Daily observations of the opacity from source SN-09 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective actions, and document that the visible emissions did not appear to be in excess of the permitted opacity following the corrective actions. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. a.) The date and the time of the observation, b.) If visible emissions which appeared to be above the permitted limit were detected, c.) If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken, d.) The name of the person conducting the opacity observations. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

5. The permittee will not exceed the production limit of 8,300 tons of sand during any consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and A.C.A. §8-4-311 and 40 CFR 70.6]

6. The permittee will maintain records which demonstrate compliance with the limit set in Specific Condition No. 5 and may be used by the Department for enforcement purposes. Compliance will be determined on a monthly basis by totaling the sand dried for the previous twelve months. The permittee will update the records by the fifteenth day of the month following the last month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. The monthly reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported six months. [Regulation 19 §19.705 and 40 CFR Part 52, Subpart E]

Source No. SN-10 Description

Source SN-10 is the rotary kiln. The brick raw material needs a non-plastic (non-clay) material that 'opens' the clay body up during the drying and firing processes. These non-plastics give the moisture from the internal part of the brick an avenue to the surface of the brick. One type of non-plastic is the kaolin clay that is used in the stockpiles. This clay is sized through the primary and secondary crushers and is then fired through the rotary kiln to a temperature of 1700 degrees Fahrenheit. This equipment was installed in 1968.

Specific Conditions

7. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by Specific Condition 11. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 7 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	3.9	10.5
SO_2	7.0	26.6
VOC	0.6	2.0
CO	1.0	3.0
NO_X	4.0	16.2

8. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by Specific Condition 11. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 8 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	3.9	10.5
HF	0.07	0.29
HCL	0.03	0.10

9. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

Table 9 – Visible Emissions

SN	Limit	Regulatory Citation
10	20%	§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E

10. Daily observations of the opacity from source SN-10 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective actions, and document that the visible emissions did not appear to be in excess of the permitted opacity following the corrective actions. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. a.) The date and the time of the observation, b.) If visible emissions which appeared to be above the permitted limit were detected, c.) If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken, d.) The name of the person conducting the opacity observations. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

11. The permittee will not exceed the production limit of 64,000 tons of calcine material during any consecutive twelve month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and A.C.A. §8-4-311 and 40 CFR 70.6]

12. The permittee will maintain records which demonstrate compliance with the limit set in Specific Condition No. 11 and may be used by the Department for enforcement purposes. Compliance will be determined on a monthly basis by totaling the calcine material fired for the previous twelve months. The permittee will update the records by the fifteenth day of the month following the last month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. The monthly reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported six months. [Regulation 19 §19.705 and 40 CFR Part 52, Subpart E]

Source No. SN-12, SN-13, and SN-17 Description

Source SN-12 and SN-13 are the exhaust fans for the two Eastgate dryers. Source SN-17 is the exhaust fan for the Westgate dryer. The dryers are counter-flow heat exchangers. The kiln cars travel at a continuous rate through the dryers. The heat source for the dryers is waste heat from the cooling zone of the tunnel kiln. This heat is introduced at the exit of the dryer and travels opposite the flow of the brick. This air movement is accomplished by large exhaust fans at the entrance of the dryers. The fans pull the heat from the exit to the entrance which results in optimum drying conditions. Temperature and humidity are controlled by recirculation and ambient air input points throughout the length of the dryer. The Eastgate dryers were installed in 1968, and the Westgate dryer was installed in 1978.

Specific Conditions

13. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by Specific Condition 21. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 10 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	9.5	36.7
SO_2	18.2	47.8
CO	4.0	17.2

14. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by Specific Condition 21. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 11 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	9.5	36.7
HF	0.27	0.79

15. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

Table 12 – Visible Emissions

SN	Limit	Regulatory Citation
12, 13, 17	20%	§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E

16. Daily observations of the opacity from sources SN-12, SN-13, and SN-17 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective actions, and document that the visible emissions did not appear to be in excess of the permitted opacity following the corrective actions. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. a.) The date and the time of the observation, b.) If visible emissions which appeared to be above the permitted limit were detected, c.) If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken, d.) The name of the person conducting the opacity observations. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

Source No. SN-14 and SN-18 Description

Source SN-14 is the exhaust fan for the Eastgate tunnel kiln, and source SN-18 is the exhaust fan for the Westgate tunnel kiln. These tunnel kilns fire the brick to a temperature of approximately 2140 degrees Fahrenheit. The kilns are continuous operations. The firing portion of the tunnel kilns are counter flow heat exchangers. The combustion gases introduced into the tunnel by high velocity burners are pulled opposite the direction of brick travel through the tunnel kiln. The cooling zone begins at the end of the firing zone. A neutral pressure exists at this point. The combustion gases at the end of the firing zone are pulled toward the entrance by the exhaust fan. The ambient air introduced for rapid cooling at the start of the cooling zone is pulled the other direction by the dryer supply fan. This fan supplies the dryers with their heat source. The Eastgate kiln was installed in 1968, and the Westgate kiln was installed in 1978.

Specific Conditions

17. The permit allows the following maximum emission rates. The permittee will demonstrate compliance with this condition by Specific Condition 21. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. 19 §19.501 *et seq.* effective February 15, 1999, and 40 CFR Part 52, Subpart E]

Table 13 – Maximum Criteria Emission Rates

Pollutant	lb/hr	tpy
PM_{10}	5.1	18.9
SO_2	28.0	90.2
VOC	1.5	3.3
CO	16.0	64.6
NO_X	14.2	32.1

18. The permittee shall not exceed the emission rates set forth in the following table. The permittee will demonstrate compliance with this condition by Specific Condition 21. The pound per hour pollutant emission rates are based on the maximum stack testing data. The ton per year pollutant emission rates are based on the average stack testing data. [Regulation No. §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Table 14 – Maximum Non-Criteria Emission Rates

Pollutant	lb/hr	tpy
PM	5.1	18.9
HF	4.84	20.63
HCL	1.35	5.69

19. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

Table 15 – Visible Emissions

SN	Limit	Regulatory Citation
14, 18	20%	§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E

20. Daily observations of the opacity from sources SN-14 and SN-18 shall be conducted by personnel familiar with the permittee's visible emissions. The permittee shall accept such observations for demonstration of compliance. The permittee shall maintain personnel trained in EPA Reference Method 9. If visible emissions which appear to be in excess of the permitted opacity are detected, the permittee shall immediately take action to identify the cause of the visible emissions, implement corrective actions, and document that the visible emissions did not appear to be in excess of the permitted opacity following the corrective actions. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated daily, kept on site, and made available to Department personnel upon request. a.) The date and the time of the observation, b.) If visible emissions which appeared to be above the permitted limit were detected, c.) If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken, d.) The name of the person conducting the opacity observations. [Regulation No. 19 §19.705 and 40 CFR Part 52, Subpart E]

21. The maximum allowable production at the Eastgate Tunnel Kiln (SN-14) is 137,841 tpy of fired ware during any consecutive 12-month period, and the maximum allowable production at the Westgate Tunnel Kiln (SN-18) is 87,599 tpy fired ware during any consecutive 12-

month period. [Regulation No. 19 §19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and A.C.A. §8-4-311 and 40 CFR 70.6]

22. The permittee will maintain monthly records to demonstrate compliance with Specific Condition No. 21. The records should include a rolling 12 month total. The permittee will update the records by the fifteenth day of the month following the last month. The permittee will keep the records onsite, and make the records available to Department personnel upon request. The monthly reports shall also be submitted to the Department per General Provision 7 by the last day of the month after the reported six months. [Regulation 19 §19.705 and 40 CFR Part 52, Subpart E]

23. The permittee will submit a permit modification application which will bring Acme Brick Company – Perla Plant into full compliance with 40 CFR Part 63, Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing*. The application must be submitted no later than 180 days prior to May 16, 2006. [Regulation No. 19 §19.304, 40 CFR Part 63, Subpart JJJJJ, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Section V: COMPLIANCE PLAN AND SCHEDULE

Acme Brick Company – Perla Plant does not currently have an enforcement action. Acme Brick Company – Perla Plant will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

Section VI: Plant Wide Conditions

1. The permittee will notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation No. 19 §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation No.19 §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) New Equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start-up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee will submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation No.19 §19.702 and/or Regulation No. 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation No.19 §19.702 and/or Regulation No.18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]
   a. Sampling ports adequate for applicable test methods
   b. Safe sampling platforms
   c. Safe access to sampling platforms
   d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee will maintain the equipment in good condition at all times. [Regulation No.19 §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation No. 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee will not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303. [Regulation No. 18 §18.8 and A.C.A. §8-4-303]

8. The permittee will not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants to become airborne. [Regulation No. 18 §18.9]

Title VI Provisions

9. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]
    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
10. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]
    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
11. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

12. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

13. The permittee can switch from any ozone-depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

Permit Shield

14. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in Table 16 - Applicable Regulations of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated February 28, 2003.

Table 16 - Applicable Regulations

Source No.	Regulation	Description
Facility	Arkansas Regulation 19	Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation 26	Regulations of the Arkansas Operating Air Permit Program

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated February 28, 2003.

Table 17 - Inapplicable Regulations

Source No.	Regulation	Description
Facility	New Source Performance Standards	Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) – The facility commenced construction, reconstruction, and modification before August 31, 1983

Section VII: Insignificant Activities

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement is a significant activity even if this activity meets the criteria of §304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated **February 28, 2003.**

Table 18 - Insignificant Activities

Description	Category
SN-29, Primary Crusher	A-13
SN-30, Secondary Crusher	A-13
SN-31, Secondary Syenite Sand Feeder	A-13
SN-32, Clay Storage	A-13
SN-33, Brick Crusher	A-13
SN-34, Primary Syenite Sand Feeder	A-13
SN-35, Calcine Clay Feeder	A-13
SN-36, Grinding Building	A-13
IA-7, Dry Coating Mixer	A-13
IA-8, Bat Loss Drop	A-13
IA-9, Screw Blenders	A-13
IA-10, Pugmill	A-13
IA-11, Brick Saw	A-13
IA-12, Brick Packaging / Dehacking	A-13
IA-13, Brick Setting	A-13
IA-14, Slurry Mixers	A-13
IA-15, Clay Silo Surge Bins	A-13

Description	Category
IA-16, 1000 Gallon Gasoline Tank	A-13
IA-17, Conveyor Drop Points and Material Storage	A-13
IA-20, Additive Storage	A-13
IA-21, Additive Application Points	A-13
IA-22, Kiln Car Repair	A-13
IA-23, Brick Reprocessing/Castable Mixing	A-13
IA-24, Lime Feed	A-13
IA-25, Fire Clay/Bag Feeders	A-13
IA-26, Brick Holding Area	A-13
IA-28, Material Storage	A-13
IA-29, Calcine Clay Feeder	A-13
IA-31, Grinding Room Cleanout	A-13
IA-32, East Plant Clay Scrap Cleanout	A-13
IA-33, Car Cleaner Systems	A-13
IA-37, Conveyor Drop Point and Material Storage	A-13
Vehicle Travel	A-13
Waste Oil, 1500 Gallons, <0.01 psi vapor pressure at STP	A-3
Waste Oil, 1000 Gallons, <0.01 psi vapor pressure at STP	A-3
Waste Oil, 500 Gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 300 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 55 gallons, <0.01 psi vapor pressure at STP	A-3

Description	Category
Hydraulic Reservoir, 110 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 300 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 110 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 60 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 60 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 30 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 10 gallons, <0.01 psi vapor pressure at STP	A-3
Hydraulic Reservoir, 20 gallons, <0.01 psi vapor pressure at STP	A-3
Antifreeze Tank, 55 gallons, <0.01 psi vapor pressure at STP	A-3
Antifreeze Tank, 55 gallons, <0.01 psi vapor pressure at STP	A-3
Diesel Tank, 9000 Gallons, <0.01 psi vapor pressure at STP	A-3

Description	Category
Diesel Tank, 9000 Gallons, <0.01 psi vapor pressure at STP	A-3
Diesel Tank, 1000 Gallons, <0.01 psi vapor pressure at STP	A-3
Diesel Tank, 1000 Gallons, <0.01 psi vapor pressure at STP	A-3
Die Lube Reservoir, 275 gallons, <0.01 psi vapor pressure at STP	A-3
Die Lube Reservoir, 300 gallons, <0.01 psi vapor pressure at STP	A-3
Clay Drier Burner, <10MMBtu/hr	A-1
Stand By Generators, operates < 2160 hr/year each	A-12

Pursuant to §26.304 of Regulation 26, the Department determined the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

Section VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation No. 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.[40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation No. 26 §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation No. 26 §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation No. 26 §26.701(C)(2)]
   a. The date, place as defined in this permit, and time of sampling or measurements;
   b. The date(s) analyses performed;
   c. The company or entity performing the analyses;
   d. The analytical techniques or methods used;
   e. The results of such analyses; and
   f. The operating conditions existing at the time of sampling or measurement.

6. The permittee must retain the records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or

application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every 6 months. If permit establishes no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within 30 days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26 §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 CFR 70.6(a)(3)(ii)(B) and Regulation No. 26 §26.701(C)(2)(b)]

   Arkansas Department of Environmental Quality
   Air Division
   ATTN: Compliance Inspector Supervisor
   Post Office Box 8913
   Little Rock, AR 72219

8. The permittee will report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit. The permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include: [40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

   a. The facility name and location
   b. The process unit or emission source deviating from the permit limit,
   c. The permit limit, including the identification of pollutants, from which deviation occurs,
   d. The date and time the deviation started,
   e. The duration of the deviation,
   f. The average emissions during the deviation,
   g. The probable cause of such deviations,
   h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
   i. The name of the person submitting the report.

   The permittee will make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

[40 CFR 70.6(a)(3)(iii)(B), Regulation No. 26 §26.701(C)(3)(b), Regulation No. 19 §19.601 and §19.602]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), §26.701(E) of Regulation No. 26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation No. 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation No. 26 §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation No. 26 §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation No. 26 §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation No. 26 §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation No. 26 §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation No. 19. [40 CFR 70.6(a)(7) and Regulation No. 26 §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation No. 26 §26.701(H)]

17. If the permit allows different operating scenarios, the permittee will, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation No. 26 §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation No. 26 §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation No. 26 §26.2. [40 CFR 70.6(c)(1) and Regulation No. 26 §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation No. 26 §26.703(B)]

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
    d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee will submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation No. 26 §26.703(E)(3)]

    a. The identification of each term or condition of the permit that is the basis of the certification;
    b. The compliance status;
    c. Whether compliance was continuous or intermittent;
    d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
    e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation No. 26 §26.704(C)]
    a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
    b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
    c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
    d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. This permit authorizes only those pollutant-emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

Request for PDS Invoice				
Invoice Number (assigned when invoice printed)	PDS-			
AFIN r	30-00008			
Name (for confirmation only)	Acme Brick Company – Perla Plant			
Invoice Type (pick one) r	Initial	Mod X	Variance	
	Annual	Renewal X	Interim Authority	
Permit Number r	1154-AOP-R1			
Media Code r	A			
Fee Code or Pmt Type r	T5			
Fee Description (for confirmation only)	Title V			
Amount Due r (whole dollar amount only)	$500			
Printed Comment(600 characters maximum)				
Note: The information below is for use by the requesting division if desired; it will not print on the invoice.				
Engineer	Karen Cerney			
Paid? (yes/no)				
Check number				
Comments	Minimum Fee of $500			
r **Required data** (See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)				
Request submitted by:		Date:		

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation No. 26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Acme Brick Company owns and operates a clay brick manufacturing facility located off US Highway 67 North in Malvern, Arkansas. This facility manufactures hard fired clay brick for use in the construction of commercial, residential and architectural structures. There are two separate brick manufacturing operations at the Perla facility (Eastgate and Westgate). This Title V permit renewal and modification changes one source (SN-09) from an insignificant activity to a permitted emission source, it redistributes the current annual production rate between the two plants, and it updates emission factors for the rotary kiln and drier based on current stack test data. The proposed changes result in an increase of 8.3 tpy of SO_2 emissions, 8.1 tpy of NO_x emissions, and 2.3 tpy of VOC emissions.

The staff of the Department reviewed the application, and the application received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Karen Cerney, Engineer. Citizens can reach both Doug Szenher and Karen Cerney at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. Garland County Public Library, 1427 Malvern Ave., Hot Springs, AR 71901 has a copy of the draft permit. Citizens may review this information during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal or the proposed modification, to the Department at the above address - Attention: Doug Szenher. For the Department to consider the comment, the interested or affected persons must submit written comments within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, the Department will schedule and hold a hearing if the Department receives significant comments on the permit provisions. If the Department schedules a hearing, the Department will give adequate public notice in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director will make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation No. 8) and Regulation No. 26.

Dated this

Marcus C. Devine
Director