RESPONSE TO COMMENTS

Acme Brick Company – Ouachita Plant
1615 Grigsby Ford Road
Malvern, AR  72104
Hot Spring County
AFIN:  30-00086

On, August 14, 2006, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. Before the close of the comment period, comments were received from the facility. The Department gives the following responses to these comments:

**Facility Comments**

**Comment 1:**  SN-04 and SN-05

The condition requires weekly opacity observations for SN-04 and SN-05. The dryer sources (SN-04 and SN-05) do not have a history of opacity violations as submitted with previous applications and as inspected by ADEQ. The requirement for weekly opacity observations is excessive based on the sources operating status. The weekly observations should be removed from the permit.

**Response 1:**

Since the facility is Title V, the requirements for opacity monitoring will not be removed from the permit. A review of the opacity readings for Acme did not reveal any violations of the opacity limits for SN-04 or SN-05. The Acme facility in Perla has an opacity frequency of once per month. The final permit will change the opacity reading frequency to once per month.

**Comment 2:**  SC #8: SN-06

The condition references SN #’s 04 and 05 on page 13. The correct reference is SN-06.

**Response 2:**

The final permit corrects the reference to SN-06.

**Comment 3:**  SC #18: SN-09

The condition requires weekly opacity observations for SN-09. The grinding building is subject to NSPS OOO due to the installation of two new silos and multiple conveyors which are connected to an exempt grinding system. Only the new equipment is subject to NSPS OOO. The permittee demonstrated compliance with the NSPS OOO standard for building fugitives and submitted the official opacity reading to the ADEQ. This is an enclosed building and there has not been a history of opacity violations as submitted with previous applications and as inspected by ADEQ. The requirement for weekly opacity observations is excessive based on the sources operating status. The weekly observations should be removed from the permit.

**Response 3:**

The building where SN-09 is located is completely enclosed. There is little likelihood of visible emissions leaving the building. The final permit changes the observation frequency to once per month.
Comment 4: Section V: Compliance Plan and Schedule

The section references a proposed CAO. The order has been executed and assigned CAO: LIS #06-100.

Response 4:

The final permit in the Compliance Plan and Schedule references CAO: LIS #06-100.

Comment 5: Plantwide Condition 15

Plantwide Condition 15 needs to reflect the applicability of 40 CFR Subpart JJJJ to SN-06 in the applicable regulations table.

Response 5:

The final permit adds 40 CFR Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing to the list of applicable regulations.