

**EPA Comments on the Proposed Title V Permit for Phoenix Brickyard
February 18, 2005**

1. The permit is missing operational and monitoring requirements specific to the baghouses. The permit should include a normal range for pressure differential across the baghouse that will show compliance with applicable limits, a requirement to monitor the pressure differential, and a requirement to regularly replace baghouse filters. At a minimum we recommend that the O&M plan be included as an attachment to the Title V permit. We also recommend an expanded discussion in the TSD to show how the baghouses will assure compliance with the 0.02 gr/dscf and opacity limits.

Condition 22A contains a requirement to source test baghouse DC-001 and either DC-002 or DC-004. The TSD states that since DC-004 and DC-002 are similar baghouses, only one is required to be tested. All new control equipment should be source tested at least once to ensure that the equipment has been installed properly and is operating free of defects. In addition, the equipment list in attachment A of the permit shows that there is an additional baghouse, DC-003, that is not discussed in the permit or in the TSD. Please explain what requirements will apply to this baghouse and whether or not it has been or will be source tested.

2. Permit condition 18E: The TSD contains a discussion of the 287 lb/day HF limit voluntarily accepted by the source to provide some assurance that the 1-hr AAAQG for HF will not be exceeded. This discussion states that a more ideal limit would be an hourly limit, but that the recordkeeping associated with an hourly limit would be burdensome to a facility such as Phoenix Brick. We think that the TSD would be more complete if it described why hourly recordkeeping would be burdensome and if there would be a way to accomplish hourly recordkeeping with minimal burden on the source.
3. Condition 20.D.1.a requires that the permittee maintain a current list of VOC containing materials and their VOC content. We recommend stating how the VOC content is to be determined. If the information on VOC content will be used for emission inventory or compliance assurance purposes, we recommend requiring the use of manufacturers' specifications or on-site testing rather than the use of Material Safety Data Sheets.
4. We understand that the revised Salt River PM-10 plan submitted on August 2, 2004, will impose new PM-10 controls on this facility that may also help control the emissions of hydrogen fluoride (lime-coated baghouses). We believe it would be useful to include a discussion of the PM10 plan in the TSD.