



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101
30 MAR 2007

W. Clark Smith
Permitting Section Supervisor
Air Quality Division
Nebraska Department of Environmental Quality
P.O. Box 98922
Lincoln, NE 68509-8922

RE: Endicott Clay Products Company
Draft review PSD Construction Permit comments

Dear Mr. Smith:

The United States Environmental Protection Agency (EPA) has completed its review of the Endicott Clay Products Company (Endicott) draft PSD construction permit and has the following comments:

On November 2, 2005, EPA made some suggestions related to the total fluoride emissions limit in Specific Condition XIII.(A)(3) of the pre-draft permit. The EPA would like to state that we did not intend that the total fluoride emissions factor should be increased. Our concern regarding the selection of the total fluoride emissions limit used for estimating potential to emit (PTE) for the 1985 modification/construction of plant 3 was regarding the lack of monitoring, reporting and recordkeeping to show that the source is actually meeting the limit. We did not imply that the PSD permit limits total fluoride emissions from Plant 3, Kiln 1 (Unit 12) of 2.08 lbs/hr was set too low. We encourage the Nebraska Department of Environmental Quality (NDEQ) to reconsider setting the total fluoride emissions limit at the originally proposed 2.08 lbs/hr.

Additionally, pages 1 and 5 of the Fact Sheet each have a typographical error that makes reference to "one of the 18 source categories" as opposed to one of the 28 source categories regulated under PSD.

As always, we appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Patricia Scott at (913) 551-7312 if you have any questions or comments regarding this letter.

Sincerely,

Michael J. Bronski

JoAnn JoAnn M. Heiman
Branch Chief
Air Permitting and Compliance Branch
Air, RCRA, and Toxics Division