

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR
PERMIT SECTION

MAY 25, 2011

Responses to Comments on the
Draft CAAPP Operating Permit for
BRP USA, Inc.
for a fiberglass boat manufacturing plant
in Benton, Illinois

Source Identification No.: 055005ABE
Application No.: 96030086

I. BACKGROUND

On October 17, 2005 the Illinois EPA, Bureau of Air received a CAAPP operating permit renewal application from BRP US, Inc., for its Clean Air Act Permit Program (CAAPP) permit for an existing fiberglass boat manufacturing plant in Benton, Illinois.

The Illinois EPA has completed a public comment period on the draft of a renewed CAAPP permit. Comments were received from USEPA, Region 5. The Illinois EPA has prepared this document, which addresses significant comments to accompany the submittal of proposed CAAPP permit.

II. COMMENTS WITH RESPONSES

Comments from USEPA

1. The draft permit contains anticipated operating scenarios as provided for in 39.5(7)(1) of the Illinois Environmental Protection Act (Act). However, the permit does not meet the requirements to maintain a log of the scenario under which it is operating (39.5(7)(1)(i)(A)) and require monitoring, recordkeeping, and reporting (39.5(7)(1)(i)). IEPA must ensure that the permit contains these requirements for the anticipated operating scenario in 7.1.11.

Response:

The Illinois EPA has deleted the conditions in 7.1.11 at the company's request because those conditions are no longer needed.

2. Condition 5.2.2 of the draft permit lists two applicable requirements from the state implementation plan that apply to the facility as a whole. However, section 5 of the permit does not include monitoring, recordkeeping or reporting necessary to assure compliance with these applicable requirements pursuant to 39.5(7)(b) of the Act. IEPA must ensure that the permit contains monitoring, recordkeeping or reporting necessary to assure compliance with all applicable requirements and the statement of basis must include the rationale for the periodic monitoring required in section 5.0 of the permit.

Response:

The Illinois EPA found the conditions to be duplicates of conditions already in Section 7.1.3 (30% opacity limit and fugitive dust) and deleted them from Section 5.2.2. The required monitoring record keeping, and reporting can be found in the appropriate sections of Condition 7.1.

3. The initial permit for BRP required BRP to use a RTO as a control device. The draft renewal permit omits these requirements. After a May 19, 2011, phone conversation between Genevieve Damico, of my staff, and Kaushal Desai, the IEPA permit writer, I understand that BRP has voluntarily lowered the volatile organic compound (VOC) content of its coating and no longer needs to use the RTO to comply with the underlying applicable requirements.

However, the statement of basis does not discuss this change in operation, nor does the permit require BRP to use the lower VOC coatings. IEPA must include an explanation for the removal of the RTO requirements from the renewal permit in the statement of basis (39.5(8)(b) of the Act) and require BRP to apply for a permit modification in the permit if it wishes to return to using higher VOC coatings which will require the use of the RTO to

Response: The Illinois EPA has added condition 7.1.5(i) which states:

"The Permittee shall apply for a modification to this permit if they restart the regenerative thermal oxidizer for the purpose of controlling emissions from the affected boat manufacturing lines pursuant to 39.5(7)(b)."

Originally, BRP was permitted to use an RTO to control emissions with non-compliant coatings. They have now switched to all compliant coatings and therefore do not use their oxidizer anymore.

The Illinois EPA agrees that given the unique requirement for the establishment of operating limits if BRP should ever begin operation of the RTO that a condition to ensure proper testing, monitoring, reporting, and recordkeeping is memorialized in the permit.

4. The following permit terms are missing an origin and authority:
 - a. 7.1.5(c)
 - b. 7.1.8
 - c. 7.1.11
 - d. 7.1.12(d)

Response: The Illinois EPA agrees that origin of authorities are needed for the above conditions. They have been included in the permit.

Condition	Origin of Authority Added
a. 7.1.5(c)	39.5(7)(b) of the Act
b. 7.1.8	39.5(7)(d) of the Act
c. 7.1.11	No longer required because condition deleted
d. 7.1.12(d)	39.5(7)(b) of the Act

5. Condition 7.1.3(c) references 7.1.3(c) (ii) which does not exist. IEPA must clarify what the exceptions from the requirements of 7.1.3(c) are if any at all.

Response: Removed incorrect reference and added correct one in 7.1.3(c). Now, the condition references the applicable requirement, 35 IAC 215.302.

6. Conditions 7.1.5(a) and 7.1.5(f) have the wrong origin and authority. IEPA must reference the correct origin and authority for each permit condition.

Response: Corrected origin and authority in those conditions.

7. Condition 7.1.9(a)(iv) references 7.1.7(b) which does not exist. IEPA must clarify what test methods are required of BRP.

Response: Changed condition to correct reference which is 7.1.7(a) and not 7.1.7(b) as previously stated. The testing required by NESHP 40 CFR 63.5758(a)(5) is referenced there.

8. Condition 7.1.9(b)(iii) contains applicable requirements from 40 C.F.R. Part 63, Subpart VVVV for sources without add-on controls and 7.1.9(iv) contains requirements for sources with add-on controls. Only one requirement should be applicable. IEPA must remove the non-applicable recordkeeping requirement.

Response: Deleted conditions that referenced add-on controls.

9. Condition 7.1.10(c) contains two reporting schedules. 7.1.10(c)(i) and (ii) is the reporting schedule provided for by 40 C.F.R. Part 63, Subpart VVVV for sources with add-on control and 7.1.10(c)(iii) allows the permitting authority to chose another reporting schedule. IEPA must require either the appropriate reporting schedule from Subpart VVVV or chose a schedule that meets the semiannual reporting requirements of 39.5 of the Act in the permit.

Response: The reporting schedule from Subpart VVVV was chosen because that is a compliance scheduling while the other is a semi-annual monitoring report.

10. "F" must be redefined to be the latest emission factors and equations based on the Unified Emission Factors for Open Molding of Composites in condition 7.1.12(d).

Response: Changed definition of "F" to clarify how it is calculated. Specifically, using the calculations in the latest Unified Emissions Factors for Open Molding of Composites.

III. USEPA-Region V Comments

FOR ADDITIONAL INFORMATION

Questions about the public comment period and permit decision should be directed to:

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