



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

MAY 24 2011

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

REPLY TO THE ATTENTION OF:

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's (IEPA) draft renewal of the Clean Air Act Permit for BRP US Inc. (BRP) (application number 96030086).

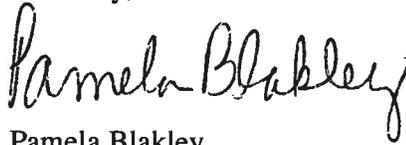
1. The draft permit contains anticipated operating scenarios as provided for in 39.5(7)(l) of the Illinois Environmental Protection Act (Act). However, the permit does not meet the requirements to maintain a log of the scenario under which it is operating (39.5(7)(l)(i)(A)) and require monitoring, recordkeeping, and reporting (39.5(7)(l)(i)). IEPA must ensure that the permit contains these requirements for the anticipated operating scenario in 7.1.11.
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.
3. The initial permit for BRP required BRP to use a regenerative thermal oxidizer (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, no 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 control VOC emissions and different requirements of 40 C.F.R. Part 63, Subparts A and VVVV will be applicable.

The remaining comments are enclosed.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive style with a large initial "P".

Pamela Blakley
Chief
Air Permits Section

Enclosure

Additional Comments for BRP US Inc. (application number 96030086)

1. 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)
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.
7. "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).