

Air Permit Review

Region: Asheville Regional Office
County: Mitchell
NC Facility ID: 6100088
Inspector's Name: Mike Parkin
Date of Last Inspection: 01/29/2009
Compliance Code: 3 / Compliance - inspection

Permit Issue Date:

| | | | |
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| Facility Data | | | Permit Applicability (this application only) |
| Applicant (Facility's Name): BRP US, Inc. - Spruce Pine Facility Address: BRP US, Inc. - Spruce Pine 1211 Greenwood Road Spruce Pine, NC 28777 SIC: 3365 / Aluminum Foundries NAICS: 331524 / Aluminum Foundries (except Die-Casting) Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V | | | SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers & Process Heaters]</i> |
| Contact Data | | | Application Data |
| Facility Contact | Authorized Contact | Technical Contact | Application Number: 6100088.09A Date Received: 09/17/2009 Application Type: 112(j) Part II Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 05331/T19 Existing Permit Issue Date: 11/20/2007 Existing Permit Expiration Date: 12/31/2011 |
| Bernice Wilson Environmental Coordinator (828) 766-1185 1211 Greenwood Road Spruce Pine, NC 28777 | Lisa Bryant Human Resources Manager (828) 766-1180 1211 Greenwood Road Spruce Pine, NC 28777 | Bernice Wilson Environmental Coordinator (828) 766-1185 1211 Greenwood Road Spruce Pine, NC 28777 | |
| Review Engineer: Fern Paterson, P.E. | | Comments / Recommendations: | |
| Review Engineer's Signature: _____ Date: _____ | | Issue 05331/T20 Permit Issue Date: _____ Permit Expiration Date: 12/31/2011 | |

I. Purpose of Application

BRP US, Inc. - Spruce Pine is located in Spruce Pine, Mitchell County, North Carolina. Application No. 6100088.09A, received September 17, 2009, is a Part 2 MACT "Hammer" application for two natural gas- and propane-fired boilers (**ID Nos. ES-37 & ES-44**), rated at 14.7 million British thermal units per hour (MMBtu/hr) each.

II. Permit Modifications/Changes

The following table describes the modifications to the current permit.

| Page(s) | Section | Description of Change(s) |
|---------|-------------------|---|
| 1 | Permit Cover Page | Amend permit revision numbers and issuance/effective dates. |
| 4 | Section 1, Table | - Add 112(j) designations to affected boilers (ID Nos. ES-37 & ES-44). - Remove asterisks and footnotes for previously minor modifications. |
| 6 | Section 2.1.A.4. | Add Section to include applicable 112(j) requirements for the affected boilers (ID Nos. ES-37 & ES-44). |
| 27-35 | Section 3 | Update General Provisions with the most recent revision (v. 3.0) |
| N/A | Part II | Remove Part II from the permit. |

III. Regulatory Review

1. **15A NCAC 2D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General's office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT "hammer" provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On August 21, 2009, the NC DAQ received a Part 2 MACT "Hammer" application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ's recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas and propane fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA's AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- i. Inspect the burner, and clean or replace any components of the burner as necessary;*
- ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,*
- iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.*

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

IV. Draft Permit Review Summary

Mike Parkin & Patrick Ballard of the Asheville Regional Office were provided a draft permit and draft permit review document on December 8, 2009.

Bernice Wilson of BRP, Inc. – Spruce Pine was provided a draft permit for review on December 8, 2009.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on **<DATE>**. **<SUMMARY OF COMMENTS>**.

V. Recommendations

This permit modification application for the BRP, Inc. facility located in Spruce Pine, Mitchell County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Issue Permit No. 05331T20