

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	
PETITION OF ROYAL FIBERGLASS POOLS,	)	AS 2009-04
INC. FOR AN ADJUSTED STANDARD FROM	)	(Adjusted Standard-Air)
35 ILL. ADM. CODE 215.301	)	
	)	

**NOTICE**

TO: John Therriault, Assistant Clerk	Carol Webb, Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
James R. Thompson Center	James R. Thompson Center
100 West Randolph, Suite 11-500	100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218	Chicago, Illinois 60601-3218

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PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the ILLINOIS EPA'S RESPONSE TO QUESTIONS POSED BY THE ILLINOIS POLLUTION CONTROL BOARD IN THE MATTER OF ROYAL FIBERGLASS POOLS' PETITION FOR AN ADJUSTED STANDARD of the Illinois Environmental Protection Agency a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
 PROTECTION AGENCY

By: /s/ Charles E. Matoesian

Charles E. Matoesian  
 Assistant Counsel  
 Division of Legal Counsel

DATED: October 14, 2009

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**THIS FILING IS SUBMITTED  
 ON RECYCLED PAPER**

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**ILLINOIS EPA'S RESPONSE TO QUESTIONS POSED BY THE ILLINOIS  
POLLUTION CONTROL BOARD IN THE MATTER OF ROYAL FIBERGLASS  
POOLS' PETITION FOR AN ADJUSTED STANDARD**

NOW COMES Respondent, ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA" or "Agency"), by its attorney, Charles E. Matoesian, and files this response to the questions of the Illinois Pollution Control Board's ("Board") attached to the Hearing Officer's Order of June 4, 2009.

**28.1.c**

*2. If granted, will the adjusted standard be submitted to USEPA for inclusion in the Illinois SIP?*

Yes.

**104.406(d)**

*5. Please describe the area affected. What is the ozone attainment status of the county in which the Dix Plant is located? Is the ozone attainment status poised to be changed in the near future?*

The Dix Plant is in Jefferson County. This county is currently in attainment with the Ozone NAAQS, and no change in the county's attainment status is imminent.

**104.406(f)**

*19. This question is addressed to both the petitioner and the Agency: The Air Quality Impact Analysis for ozone was performed based on the assumption that 25 tons per year would be the maximum VOM emitted and that the 1-hour ozone standard is 120 ppb. However, there are no limitations proposed in the adjusted standard language.*

*(a) Would you please comment on proposing a condition in the adjusted standard language that would limit VOMs to 25 tpy or less.*

IEPA has no objection to an annual VOM emission limit being included in the adjusted standard language.

*(b) Would you also please comment on proposing a condition that would require a re-evaluation of the adjusted standard if the ozone NAAQS is revised.*

IEPA believes that a condition requiring re-evaluation is necessary in this rulemaking. If, in the future, changes in the ozone NAAQS status to non-attainment for the Dix Plant location, the Illinois EPA will conduct a re-evaluation of emission limits on all major sources in the nonattainment area as part of the SIP process. If changes are deemed necessary, the Illinois EPA will initiate a rulemaking before the Board at that time.

**104.406(g)**

**21. This question is addressed to both petitioner and the Agency:** *The petition on page 10 states, "Royal understands that in 2005, EPA replaced the one-hour average ozone standard with an eight-hour average standard, but believes the hourly calculation presented in the attached Air Quality Impact Analysis is useful given the obvious concerns about hourly emissions that are reflected in the 8 lb/hr Rule."*

*As of March 2008, the primary ozone standard was strengthened from 0.08 parts per million (ppm), set in 1997 to a level of 0.075 ppm averaged over 8 hours (73 FR16436; March 27, 2008).*

*(a) Since the Air Quality Impact Analysis presented in the Technical Document Section 6 is based on the previous ozone standard, would you please provide an analysis of ozone impact in terms of the current ozone NAAQS?*

IEPA believes the air quality impact of the adjusted standard to be negligible. This is also IEPA's response to the next three questions: (b), (c), and (d).

*(b) Is the Scheffe (Sept. 1988) procedure and table used in Royal Pool's Air Quality Impact Analysis (TSD Sec. 6) the same for determining the ozone increment for either 1-hour as well as 8-hour periods of time?*

*(c) Is the Scheffe (Sept. 1988) procedure still the USEPA recommended procedure?*

*(d) Please comment on the results of the Air Quality Impact Analysis if the ozone increment were added to the 8-hour background air quality reading of the 4<sup>th</sup> highest measured ozone concentration from the past 4 consecutive years.*

*(e) Has the IEPA provided any guidance in conducting the Air Quality Impact Analysis or indicated appropriate measures if the ozone increment appears to cause or be contributing to a violation of the ozone NAAQS?*

IEPA provided no guidance to the petitioner in conducting the Air Quality Impact Analysis, but the Illinois EPA still uses the Scheffe procedure to evaluate ozone impacts from single sources. USEPA has not provided more recent guidance to address ozone impacts on an 8-hour basis.

**22. This question is addressed to both the petitioner and the Agency:** *The Petition at page 12 states, "...the daily amounts of VOM emitted by Royal's operations have a negligible impact on ambient ozone levels and would not cause a violation of the ozone NAAQS..." Since Hamilton County ozone monitoring stations already show exceedences of the 8-hour ozone standard of 75 ppb, would you please comment on including a condition in the adjusted standard limiting Royal Pools VOM emitting operations on ozone action days where ambient conditions are likely to exceed the 75 ppb 8-hour ozone standard?*

IEPA has no objection to a condition that would limit Royal Pools VOM emitting operations on ozone action days.

Respectfully submitted,  
**ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY**

By: /s/ Charles E. Matoesian  
Charles E. Matoesian  
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Division of Legal Counsel

DATED: October 14, 2009  
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