From:	Koerner, Jeff
To:	Svec, Ed
Subject:	FW: FW: draft of permits
Date:	Friday, November 16, 2012 3:50:12 PM

See highlighted portion of Randy's comments.

What do you think?

From: Koerner, Jeff
Sent: Thursday, November 15, 2012 9:54 PM
To: 'Randy Clunie'
Subject: RE: FW: draft of permits

Randy,

Good point on the NESHAP … we'll check it out and get back to you.

Reporting monthly records by the end of the following month is probably OK.

As for inspecting the dust collector, how about a monthly check and logging of: the date, the pressure differential, whether visible emissions were detected, and if visible emissions were detected the corrective actions taken?

Let me know.

Thanks!

Jeff

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
Phone: 850-717-9083 / Fax: 850-717-9001
Email: Jeff.Koerner@dep.state.fl.us
Web: http://www.dep.state.fl.us/air/

From: Randy Clunie [mailto:Randy.Clunie@searay.com]
Sent: Thursday, November 15, 2012 6:24 PM
To: Koerner, Jeff
Subject: RE: FW: draft of permits

Jeff,

I have a few minor questions. With regards to Cape Canaveral having a Title V Air Permit, I recognize the facility would need to maintain VOC reports, submit semi-annual & annual reports, and pay Title V fees. In regards to NESHAP VVVV will the plant be required to submit MACT-related reports even though there will be no such activities, written plan...stating no activity, etc. OR how will that part be handled. For example; Will the Responsible Official need to create and sign a report stating non NESHAP VVVV activity occurred during the ? time period on semi-annual, annual report & certification.

I am thinking it would be a good idea to insert some statement that Sea Ray/Brunswick Cape Canaveral plant has no reporting or certification obligations for NESHAP VVVV as long as no such activities is occurring. Also, FDEP may want to add some other clarification statements that it would like to insert into the permit. Your thoughts?

Also, I see that you have under RECORDS AND REPORTS: "The monthly records shall be available within 14 days following the end of each month. If acceptable to you, please change that statement to: "The monthly logs shall be completed by the end of the following month." Our industry has plant shutdowns, furloughs, etc. that could make it challenging at times to get completed within the 14-day time period. **NOTE: Under Condition A.13 (f) of our current Title V permit for MI Complex (page 9 of 52), it includes the statement: "The monthly logs shall be completed by the end of the following month."** This request would align with our current permit requirements.

You mention...Operator shall inspect the dust collector, but I don't see a inspection frequency mentioned. **Please e-mail me your thoughts on this matter.**

My Team will have a conference call on Monday, and I will get back with you if there are any other issues.
Thank you,

Randy Clunie
EHS Director for BBG Recreation Group
Address:
Sea Ray Boats, Inc.
100 Sea Ray Circle
Vonore, TN 37885
office phone: (423) 884-6631, ext # 3103
cell phone: (865) 406-7269
e-mail: Randy.Clunie@searay.com

****
This e-mail message may contain confidential or privileged information. If you are not the intended recipient, please delete the message and any attachments and notify the sender by return e-mail. You should not retain, distribute, disclose or use any of the information in this message.
****