

Lane Regional Air Pollution Authority
Synthetic Minor Air Contaminant Discharge Permit

**REVIEW REPORT
for Permit Modification**

Marathon Coach, Inc.

Permit No. 205161

General Background Information

1. Lane Regional Air Pollution Authority (LRAPA) has reviewed the permit application received on December 10, 1998. The contents of the application and subsequent correspondence with the source were the basis for the calculations contained within this review report.
2. Marathon Coach, Inc. operates a motor home manufacturing facility at 91333 Coburg Industrial Way in Coburg, Oregon. The operation comprises conversion of bus shells into recreational vehicles and executive travelers. Marathon performs the interior conversion and exterior decoration of the bus shell, which includes painting and coating various components inside and outside the unit. Cabinetry, wood trim, countertops, flooring and upholstery are constructed within the unit to customer requirements. Spray booths are used for painting and lacquering wood, plastic and metal parts which are installed in the unit.

Emission Unit Identification

3. PR-1: Production and Installation Area - uncontrolled
CS-1: Cabinet Shop - controlled by a baghouse unit
SB-1: Spray Booth - controlled by a spray booth filter system
MS-1: Metal Shop -- uncontrolled
WS-1: Wood Shop -- controlled by a baghouse unit
SC-1: Service Center - uncontrolled
CT-1: Countertop Area - uncontrolled

Reasons for Permit Issuance

4. The primary reason for permit modification is to allow increased production of motor coaches from about 60 coaches per year to 120 coaches per year. The increase will be accomplished without any physical modifications to the facility. The potential emissions from the facility are limited to below the Title V and Prevention of Significant Deterioration (PSD) levels for VOC. The emissions of Hazardous Air Pollutants (HAPs) have been limited to nine (9) tons per year for any individual HAP and 24 tons per year for any combination of HAPs. This will allow the facility to avoid major source designation for HAPs.
5. The permit is also being modified in response to Notice of Noncompliance (NON) 1736, which in part alleged the facility was emitting VOC in excess of the previously permitted levels. An increase in permitted VOC can be accomplished without violating any standards or triggering any new applicable requirements.

6. The permit type has been changed from "Minimal Synthetic Minor" to "Synthetic Minor" because the actual emissions from the facility are too high to be eligible for the "minimal" permit designation.
7. This source is located in an attainment area for all criteria pollutants.
8. This source is located within 100 kilometers of four (4) Class I air quality protection areas.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

9. This source is not subject to PSD for the affected criteria pollutants. The limit of 17.0 tons VOC per year is below the 40 tons-per-year significance level as established in LRAPA Title 38.

Enforcement Actions

10. Notice of Noncompliance (NON) 1736 was issued to the facility on November 24, 1998. NON 1736 alleged exceedance of the Plant Site Emission Limit (PSEL) for VOC, failure to submit required reports, and failure to maintain proper inspection records.

Source Tests

11. No source testing has been performed at this facility. However, Material Safety Data Sheets (MSDS) and material usage data have been provided as a means to determine the facility's VOC emissions.

Synthetic Minor Limitations for Hazardous Air Pollutants (HAPs)

12. The Synthetic Minor portion of the permit limits the source's potential to emit to 9 tons per rolling 12-month period of any single Hazardous Air Pollutant (HAP) and 24 tons per rolling 12-month period of any combination of HAPs. These limits are below the Title V thresholds of 10 tons per year for a single HAP or 25 tons per year for any combination of HAPs. If the HAP emissions exceed these thresholds, the source will become subject to the provisions of 40 CFR Part 70, Title V Operating Permits, and 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations. (See the attachment to this Review Report for determination basis calculations and projected usage rates).
 - a. The emission factor used for the HAPs assumes that 100% of the HAP component is volatile (as calculated by percent by weight HAP which is the basis for the emission rate as measured in pounds of HAP per gallon of coating). By assuming 100% of HAPs are volatile and that 100% of HAPs used are emitted, the limits effectively restrict the HAP potential to emit to less than major source thresholds.

- b. Substitutions of coatings may be employed provided that both consumption and composition records are maintained in accordance with the permit reporting requirements.
- c. To confirm the composition for each coating, diluent, and cleanup solvent, information shall be taken from the MSDS for each material.
- d. Special conditions in the permit require the source to apply for a Title V permit, exclusive of excess emission incidents, prior to an emissions increase above the Title V permit trigger levels for criteria or hazardous air pollutants.

Plant Site Emission Limits (PSELS) Information

- 13. The MSDS and material usage/purchasing information submitted by the facility was used to estimate the VOC emissions from various surface-coating operations. In accordance with LRAPA rules, the PSEL for VOC was established based on projected operating conditions.
- 14. Particulate emissions from woodworking operations are vented to three (3) baghouses which exhaust to the outside atmosphere. To provide a worst-case emission rate, the combined air flows from the baghouses were multiplied by a conservative emission factor of 0.01 gr/dscf and continuous operation (8,760 hours per year) was assumed. A well-operated baghouse is capable of emitting at lower levels than the assumed worst-case factor of 0.01 gr/dscf.
- 15. PSELS for the source restrict potential emissions from the facility to 2.8 tons per month and 17 tons per year of Volatile Organic Compounds (VOCs) and 0.62 tons per month and 5.0 tons per year of both PM and PM₁₀ (see the attachment to this Review Report). The monthly PSELS for particulate matter (PM) were set by dividing the annual limit by 12 and then multiplying by 1.5 to account for month-to-month fluctuations in production. The monthly PSELS for VOC were set by dividing the annual limit by 12 and then multiplying by 2.0 to account for wide month-to-month fluctuations in material usage. Per the PSEL rule (LRAPA 34-34-060(5)(G)), the new PSEL is based upon application of applicable control equipment requirements and projected operating conditions. The annual limit of 17 tons per year of VOC is based on the worst-case projected emissions of VOCs.

Baseline Emission Rate (BER)

- 16. The BER has been set at 0 tons per year for all pollutants since this source was not in operation during the 1978 baseline year.

Significant Emission Rate (SER)

- 17. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 38, for PM, PM₁₀, CO, NO_x, VOC, and SO₂ as shown

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below. No further air quality analysis is required for these pollutants.

Pollutant	Baseline Emissions (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	Change in PSEL (tons/yr)	Increase from Baseline (tons/yr)	SER (tons/yr)
PM	0	2.4	5.0	+2.6	+5.0	25
PM ₁₀	0	2.4	5.0	+2.6	+5.0	15
CO	0	0	0	0	0	100
NO _x	0	0	0	0	0	40
VOC	0	9.75	17.0	+7.25	+17.0	40
SO _x	0	0	0	0	0	40

Performance Standards and Limitations

18. The permittee is subject to the visible emissions standards in LRAPA 32-010, the particulate grain-loading standard in LRAPA 32-015, the highest and best requirement of LRAPA 32-005. Operation of well-maintained baghouses should assure compliance with the grain-loading and visible emissions limits. The permittee is required to periodically inspect the baghouse stacks for visible emissions. The permittee is also required to conduct inspections and maintenance of the baghouse equipment to assure compliance with the highest and best requirement.
19. The permittee is subject to the PSEL rules in LRAPA 34-060. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC are below the limits.

Monitoring, Recordkeeping and Reporting

20. The permittee is required to record all inspections and maintenance of air pollution control equipment. The permittee is also required to keep records of the amount and types of VOC- and HAP-containing materials used, the VOC and HAP compositions of each material, and calculations of VOC and HAP emissions. Semi-annual reports are required to document compliance with the HAP and VOC limits contained in the permit.

Public Notice

21. The draft permit was placed on public notice from August 23, 1999, to September 22, 1999. The public was allowed to submit comments during this 30-day period.

Comments from the Interested Public

LRAPA did not receive written comments by the public on the above permitting action. LRAPA provided an opportunity for the public to request a public hearing to present oral comments on the draft permit.

This opportunity was stated in the public notice. However, LRAPA did not receive a request by the public regarding the need to schedule a public hearing at any time during the length of the public comment period.

Comments from the Permittee

Marathon Coach Corporation submitted no comments on the draft permit.

Comments from Oregon Department of Environmental Quality (ODEQ)

The ODEQ submitted eight (8) comments on the draft permit. Six (6) of these were comments on typographical errors or text that needed simple clarification. In response to the ODEQ comments, the following changes were made to the permit:

- a. Condition 2 was revised in order to remove an informational statement from permit;
- b. Condition 3 was revised in order to state clearly what is required to comply with the 12-month rolling limit for HAP emissions.