

Lane Regional Air Protection Agency

**SIMPLE
AIR CONTAMINANT DISCHARGE PERMIT
REVIEW REPORT**

Marathon Coach, Inc.
91333 Coburg Industrial Way
Coburg, Oregon 97408
(541) 343-9991

Unassigned emissions	
Emission credits	
Source test	
COMS	
CEMS	
Compliance schedule	
Special conditions	
Annual report	X
Semi-annual report	
Quarterly report	

Monthly report	
Excess emissions report	
NSPS	
NESHAP	
NSR	
PSD	
RACT	
FCE	
Public Notice	II

TABLE OF CONTENTS

PERMITTING.....2

SOURCE DESCRIPTION.....2

COMPLIANCE.....3

SPECIAL CONDITIONS3

EMISSIONS4

MAJOR SOURCE APPLICABILITY5

ADDITIONAL REQUIREMENTS.....5

SOURCE TESTING.....5

PUBLIC NOTICE.....6

PERMITTING

PERMITTING ACTION

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on October 14, 2001 and was originally scheduled to expire on October 13, 2006. The old ACDP is being converted to a Simple ACDP in accordance with the rules adopted in October 2008.

OTHER PERMITS

2. No other permits have been issued or are required by the Lane Regional Air Protection Agency (LRAPA) for this source.

ATTAINMENT STATUS

3. The facility is located in an attainment area for particulate matter (PM₁₀), ozone (O₃), nitrogen oxides (NO_x), sulfur dioxide (SO₂), lead (Pb), and carbon monoxide (CO).
4. The facility is not located within 10 kilometers of the any Class I Air Quality Protection Area.

SOURCE DESCRIPTION

OVERVIEW

5. The facility 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. The facility was built in March 1993.
6. The following changes have been made to the facility since the last permit renewal:

A paint booth was installed February 24, 2005 including appropriate filters and air monitoring systems.

PROCESS AND CONTROL DEVICES

7. Device/Process:

EU ID	Description	Control	Date Installed
PR-1	Production and Installation Area	Uncontrolled	1993
CS-1	Cabinet Shop	Controlled by a baghouse unit	1993
SB-1	Spray Booth	Controlled by a spray booth filter system	1993
SB-2	Spray Booth	Controlled by a spray booth filter system	1993
SB-3	Spray Booth	Controlled by a spray booth filter system	2000
SB-4	Spray Booth	Controlled by a spray booth filter system	2005
MS-1	Metal Shop	Uncontrolled	1993
WS-1	Wood Shop	Controlled by a baghouse unit	1993
SC-1	Service Center	Uncontrolled	1993
SS-1	Solid Surface	Controlled by a baghouse unit	1993
OB-1	Open Booth	Removed June 2005	1993

COMPLIANCE

8. The facility was inspected on the dates listed in the table below and found to be in compliance with permit conditions.

6/02/2009	9/22/2006	11/09/2005	9/30/2002	8/01/2002	7/23/2002
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9. During the prior permit period there was one (1), complaint recorded for this facility. On July 31, 2004 LRAPA received an unconfirmed complaint from an anonymous caller about a foul odor and eye irritation. No further action was deemed necessary.

10. No enforcement actions have been taken against this facility since the last permit renewal.

SPECIAL CONDITIONS

11. 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. Annual reports are required to document compliance with the HAP and VOC limits contained in the permit. PSEL monitoring is not required for CO and NOx. Emissions of CO and NOx from natural gas combustion units is expected to be less than 5% of the PSEL limits. Particulate matter monitoring is based on the assumed rate from coatings and materials collected from baghouses.

EMISSIONS

12. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	0	0	0	4.8	24	19.2
PM ₁₀	0	0	0	4.8	14	9.2
SO ₂	0	0	0	NA	NA	NA
NO _x	0	0	0	1.9	39	37.1
CO	0	0	0	1.6	99	97.4
VOC	0	0	0	39.0	39	0
Individual HAP	0	0	0	9	9	0
Aggregate HAPs	0	0	0	24	24	0

- a. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with 37-0064(4)(b) and the netting basis is zero in accordance with 37-0040(2).
- b. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

13. For each pollutant, the proposed PSEL is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.
14. An analysis of the proposed PSEL increases over the Netting Basis is shown in the following table.

Pollutant	SER	Requested increase over previous netting basis	Increase due to utilizing capacity that existed in the baseline period	Increase due to physical changes or changes in the method of operation
PM	25	24	N/A	N/A
PM ₁₀	15	14	N/A	N/A
SO ₂	40	0	N/A	N/A
NO _x	40	39	N/A	N/A
CO	100	99	N/A	N/A
VOC	40	39	N/A	N/A

MAJOR SOURCE APPLICABILITY

CRITERIA POLLUTANTS

15. A major source is a facility that has the potential to emit more than 100 tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

HAZARDOUS AIR POLLUTANTS

16. A major source is a facility that has the potential to emit more than 10 tons/year of any single HAP or 25 tons/year of combined HAPs. This facility is not a major source of hazardous air pollutants.

Hazardous Air Pollutant	2005-2006 Emissions (tons/year)
Toluene	4.5
Hexane	4.6
Other	0.4
Total	9.5

ADDITIONAL REQUIREMENTS

NSPS APPLICABILITY

17. There are no sources at this facility for which NSPS standards have been promulgated.

NESHAPS/MACT APPLICABILITY

18. 40 CFR Part 63, Subparts JJ, MMMM, PPPP, and WWWW are not applicable to the source because the facility operates under the thresholds for applicability.

TACT APPLICABILITY

19. The facility is meeting the states TACT/Highest and Best Rules by conducting the following activities:
- Preventive maintenance will be required for the control equipment as a means to assure effective performance.

SOURCE TESTING

PRIOR TESTING RESULTS

20. There have been no source tests required, nor performed at this facility.

PUBLIC NOTICE

21. Pursuant to 37-0064(5)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with 31-0030(3)(b), which requires that LRAPA provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was published on October 26, 2009 and the comment period ended on November 30, 2009. No written comments were submitted during the public comment period**

MTL:cmw
12/10/2009

Emission Details

Baghouse Emissions

Source:	Flow Rate (cubic ft/min)	Emission Factor (0.01 gr/dscf)	Hourly Emissions (pounds)	Annual Emissions (tons)	Monthly Emissions (tons)
3 Baghouses	12719		0.01	1.09	4.78
					0.40

Flow rate is the combined flow rate for the 3 baghouses at the facility.

Emission factor is the grain loading limit.

Monthly emissions = annual emissions/12 months per year x 1.5 to allow for month to month fluctuations.

Air Make-Up Furnace (3) Emissions

Natural Gas-Fired

Pollutant	Max Design capacity (cubic ft/hr)	emission factor (lbs/10 ⁶ ft ³)	Conversion Factor (tons/lb)	Annual Emissions (tons)	Monthly Emissions (tons)
PM	4285	7.6	0.0005	0.1	0.012
SO ₂	4285	0.6	0.0005	0.01	0.001
NO _x	4285	100	0.0005	1.9	0.156
CO	4285	84	0.0005	1.6	0.131
VOC	4285	5.5	0.0005	0.1	0.009

Furnaces (3) operate 8760 hours per year.

2 Furnaces operate at a maximum rate of 2.212 MM BTU per hour each, and 1 operates at a maximum rate of 2.073 MMBTU/hr.

All three furnaces operate at a combined maximum rate of 4.285 MM BTU/hr

Furnaces operate at a maximum rate of 4,285 cubic feet per hour (1 cubic foot of natural gas = 1000 BTU).

Gaseous emission factors are obtained from AP-42 table 1.4-2 (3/98).

Annual Emissions (tons) = maximum gas usage x emission factor x 1 ton/2000 pounds x 8760 hours per year x 1/10⁶.

Hourly Emissions (pounds) = Max gas usage x emission factor x 1/10⁶.

Emission Details

VOC Emissions

MATERIAL	Annual Total (gallons)	Density (lb/gal)	Pounds (lb)	VOC (%)	VOC (lbs)
Adhesives					
Contact Cement	3449	6.99	24109	87%	20974
Woodglue-titebound	40	9.09	364	0%	0
Silicone Spray	19.5	5.67	111	80%	88
Paint/Lacquers					
primer	104	12.67	1318	22%	290
AT 190 lacuer	20	9.28	186	97%	180
wood lacuer t-70	20	7.33	147	54%	79
clear base 727	24	7.91	190	100%	190
krylon	401.3	6.38	2560	65%	1664
krylon-heat	54.3	6.37	346	35%	121
			0		
Solvents/cleaners					
			0		
acrylic lacquer thinner	282	6.82	1923	86%	1654
toluene	165	6.87	1134	100%	1134
DTL-876 Thinner	331	6.6	2185	61%	1333
Acrylic/Clean DX-330	20	6.36	127	100%	127
Parabond reducer	24	6	144	100%	144
glass cleaner	206.2	7.76	1600	11%	176
Misc.					
rubberized undercoat	69.6	6.7	466	53%	247
transcoat 161	32	7.9	253	42%	106
EXTERIOR					
Paint					
Base Coats	189	10.98	2075	75%	1556
Sparvar	3.5	6.99	24	87%	21
Clears/hardners					
DH-42	24.3	8.92	217	40%	87
DH-46	9	8.64	78	35%	27
DC 76 NR	2	7.57	15	65%	10
DC92	103	8	824	55%	453
I522-10	2	7.34	15	100%	15
Compounds					
Perfect it III	2	8.71	17	22%	4
Primers					
DE18	3	7.37	22	100%	22
DA18	2.5	6.84	17	100%	17

Emission Details

AP20	3	12.56	38	49%	18
SD30	11	10.16	112	56%	63
PH12	8.1	8.02	65	91%	59
PH36	7	8	56	60%	34
Degreasers/misc					
203 Clesol	10	6.29	63	100%	63
Klean Strip	24	10	240	95%	228
Reducers					
DR33	33	6.75	223	100%	223
DR43	12	6.93	83	100%	83
UR40	25	7.4	185	100%	185
UR50	20	7.28	146	100%	146
BR50	220	7.3	1606	100%	1606
Total Gallons	5943.3				
Total Pounds			43281		33427
Total Tons			21.6		16.7

HAP Emissions

	Interior (pounds)	Exterior (pounds)
Toluene	6790.3	583.3
MEK	341.6	0
Xylene	1336.5	527.6
Ethylbenzene	1.4	161.7
Glycol Ethers	218.5	1490.2
Methanol	365.4	24
MIBK	128	7.8
Hexane	104.8	5.4
Styrene	0	0
Methylmethacrylate	0	0
TOTAL Pounds	9287	2800
TOTAL Tons	4.6	1.4

GRAND TOTAL 6.0 tons HAPs from entire facility