

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit (ACDP)

REVIEW REPORT

Marathon Coach, Inc.

Permit No: 205172

PERMITTING

Permitting Action

1. This is an existing facility applying for a renewal of the existing ACDP.

Other Permits

2. Marathon Coach Inc. has a facility at 91333 Coburg Industrial Way in Coburg, and was issued a Synthetic Minor permit in October of 1996 for the manufacturing of motor home coaches.

Attainment Status

3. The facility is located in an attainment area for all pollutants.

SOURCE DESCRIPTION

Overview

4. The facility operates a fiberglass composites manufacturing facility at 80614 Sears Road in Cottage Grove. The facility in Cottage Grove manufactures fiberglass decorative trim and wall coverings, wire casing and other miscellaneous fiberglass components. There are no emission controls at the facility.

Process and Control Devices

6. Existing air contaminant sources at the facility consist of the following:
 - a. Fiberglass composites manufacturing process.

EMISSIONS

7. The pollutant of concern associated with this source type is primarily styrene which is a VOC and also a HAP. For a 6 ton material throughput emissions of VOCs/HAPs are estimated to be 2,466 pounds per year. The other criteria pollutants are emitted at negligible levels. Emission calculation details are as follows:

Material Type	Pollutant	Annual Throughput (lbs)	% Styrene in Resin	Emission Factor*	Emissions lb/year
ISO/Ortho Resin	VOC/HAP	21,120	43	7%	1479
RTM Resin	VOC/HAP	1,980	36	5%	99

Material Type	Pollutant	Annual Throughput (lbs)	% Styrene in Resin	Emission Factor*	Emissions lb/year
VE Resin	VOC/HAP	1,806	45	7.6%	138
Opti. Vis. Resin	VOC/HAP	480	34	4.4%	22
Resin Filler Putty	VOC/HAP	259	30	4.1%	11
Resin Bonding Putty	VOC/HAP	220	30	4.1%	10
Black Primer Gelcoat	VOC/HAP	2750	35	16.8%	462
Gray Primer Gelcoat -254	VOC/HAP	555	25	14.7%	82
Gray Primer Gelcoat -300	VOC/HAP	544	36	17.8%	97
White Gelcoat	VOC/HAP	106	31	14.7%	16
Orange Tooling Gelcoat	VOC/HAP	90	41	23%	21
Barrier Coating	VOC/HAP	47	32	14.7%	7
Black Tooling Gelcoat	VOC/HAP	44	44	26.1%	12
Duratec Primer	VOC/HAP	50	21	14.7%	7
Greg Vinyl Ester Primer	VOC/HAP	50	25	26.1%	12
TOTAL					2,466 pounds/yr

* Emission factor is from the "Unified Emission Factors for Open Moulding of Composites", using Manual application process with non-vapor suppressed resin (Non-VSR) and Uncontrolled Spray Gelcoat Application.

MINIMAL PERMIT DETERMINATION

8. The Authority has determined that the facility qualifies as a minimal source for the following reasons:
 - a. Emissions from this facility are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the gaseous criteria pollutants (VOC, CO, NOx, and SO2).

SPECIAL CONDITIONS

9. There are no special conditions specified in the permit.

NESHAPS/MACT APPLICABILITY

10. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

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

PUBLIC NOTICE

12. The draft permit was on public notice from April 26, 2006 to May 25, 2006. No written comments were received during the 30-day comment period.

MH/cmw
05/30/06