

LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT
REVIEW REPORT

Navistar, Inc. – Coburg
91320 Coburg Industrial Way
Coburg, Oregon 97408

TABLE OF CONTENTS

INTRODUCTION	2
PERMITTEE IDENTIFICATION.....	2
FACILITY DESCRIPTION	2
DESCRIPTION OF CONSTRUCTION ACDP CHANGES TO BE INCORPORATED IN TITLE V PERMIT	3
EMISSION LIMITS AND STANDARDS	4
PLANT SITE EMISSION LIMIT (PSEL) INFORMATION.....	4
SIGNIFICANT EMISSION RATE (SER)	6
HAZARDOUS AIR POLLUTANTS	6
STRATOSPHERIC OZONE-DEPLETING SUBSTANCES	6
PUBLIC NOTICE	6
EMISSIONS DETAIL SHEETS	6

INTRODUCTION

1. This permit is a Minor Permit Modification to incorporate requirements of the Reinforced Plastic Composites Production MACT as federally enforceable permit limits. The permittee submitted an application to begin making fiberglass part molds at their Coburg, Oregon facility. As part of this modification short term PSEL were removed from the permit in accordance with LRAPA 42-0042. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions. A timely renewal application was received in December 2005. The renewal is currently under review.

PERMITTEE IDENTIFICATION

2. Navistar Incorporated (Monaco RV) owns and operates a motor coach manufacturing facility located at 91320 Coburg Industrial Way in Coburg, Oregon.

FACILITY DESCRIPTION

3. The original facility in Coburg was built in 1995 to produce luxury or "high-line" motor coaches. In 1999 Monaco completed a major expansion to accommodate production of "mid-line" motor coaches (the new facility). The expected production of the plant is about 1200 high-line coaches and 4200 mid-line coaches per year. The coaches are fabricated using a variety of processes. These initial processes produce parts that are brought to the main assembly line where they are assembled into a coach. The assembled coach is then painted before leaving the plant. For the high-line product, the chassis is constructed as the initial step in the production process.

DESCRIPTION OF MINOR MODIFICATIONS TO THE TITLE V OPERATING PERMIT

4. The minor permit modification was required to allow Monaco to commence fiberglass mold making operation. Upon approval the permittee will begin making molds for producing fiberglass parts. The molds will be used offsite to produce parts used in the manufacture of motor coaches. Because the facility is major source of HAPs, the change requires the permittee to comply with applicable requirements of the Reinforced Plastic Composites Production MACT (40 CFR 63 Subpart WWWW). The permittee is proposing to make approximately one mold per month. The molds will be sent to an offsite fiberglass parts manufacturing facility. The emissions from this additional activity is expected to be approximately 0.1 tons per year styrene. Also part of this modification LRAPA elected to remove the short term PSELs set forth in condition 59 of the original permit in accordance with LRAPA 42-0042.

EMISSION LIMITS AND STANDARDS

Baseline Emissions Rate (BER) and Netting Baseline

5. The original facility was constructed in 1995 with an expansion of the facility in 1999. Therefore, the baseline emission rate (BER) for the source is zero for all pollutants. ACDP 205160 established a VOC netting basis of 240.5 tons per year for the facility.

Plant Site Emissions Limits (PSELs)

6. The plant can be operated as much as 18 hours per day, 6 days per week, and 50 weeks per year. This equates to 5400 hours per year.
7. The projected annual production at the facility is 1200 high-line units per year and 4200 mid-line units.
8. The maximum projected monthly production of high-line units is 300. The maximum projected monthly production of mid-line units is 508.
9. The annual PSEL is based on the maximum projected emissions from the source in full operation. These estimates are contained in the attached emissions details sheets.
10. A PSEL has not been established for SO₂ emissions from natural gas combustion (EU CU) since the projected emissions are less than 0.5 ton per year. This is consistent with ODEQ permitting guidance. Although the PM/PM₁₀ emissions from Assembly 96 are less than 0.5 ton per year, the emissions have been included in the determination of the PM/PM₁₀ PSEL.
11. The PSELs for the combustion units are based on natural gas usage of 220,000 MMBtu per year, which was suggested by the source as being reasonably representative of actual natural gas usage, while still allowing for possible increases in usage.
12. The **Annual (12-month rolling) PSEL (tons per year)** is shown below:

Emissions Unit ID	PM (ton/yr)	PM ₁₀ (ton/yr)	CO (ton/yr)	NO _x (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)
Assembly 96	0.3	0.3	NA	NA	NA	36
Assembly 98	0.5	0.5	NA	NA	NA	42
Paint 96	<0.1	<0.1	NA	NA	NA	32
Paint 98	<0.1	<0.1	NA	NA	NA	45.5
Cabinet Shop 96	2.5	2.5	NA	NA	NA	27
Cabinet Shop 98	9.4	9.4	NA	NA	NA	28
CU	0.6	0.6	9.2	10.9	NA	0.5
Aggregate Insignificant	1.0	1.0	1.0	1.0	NA	1.0
Total	14.3	14.3	10.2	11.9	NA	212

NA = A PSEL need not be established for the emissions unit for the pollutant.
 Insig. = The emissions unit is not a significant source for the pollutant.

SIGNIFICANT EMISSION RATE (SER)

13. This permitting action does not result in changes to the PSELs.

HAZARDOUS AIR POLLUTANTS

14. The facility is a major source of Hazardous Air Pollutants (HAPs).

STRATOSPHERIC OZONE-DEPLETING SUBSTANCES

15. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the 1990 Clean Air Act, as amended, Sections 601-618, do not apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

PUBLIC NOTICE

16. This permit action does not require public because emissions from this activity meet the definition for aggregate insignificant emissions stated in LRAPA Title 12.

EMISSIONS DETAIL SHEETS

17. Following are the estimates for projected styrene emissions from the addition of fiberglass tooling mold making

Tooling Resin	
Styrene Content	47.5 %
Emission Factor ¹	169 lbs styrene/ton gelcoat
Annual Tooling Resin Usage	1488 lbs or 0.744 tons
Estimated Annual Emissions	125.7 lbs Styrene / Year
Gelcoat	
Styrene Content	27.0 %
Emission Factor ¹	0.445 x 27.0% Styrene x 2000 = 240.3 lbs styrene/ton gelcoat
Annual Gelcoat Usage	396 lbs or 0.198 tons
Estimated Annual Emissions	78.4 lbs Styrene / Year

¹ Unified Emission Factors for Open Molding of Composites, April 2, 2009.

Total estimated styrene emissions from additional activity: 204 lbs/yr or 0.1 tons per year