

**Lane Regional Air Protection Agency
 Simple "Low" Air Contaminant Discharge Permit**

Review Report

Marathon Coach, Inc.
 91333 Coburg Industrial Way
 Coburg, OR 97408
 Website: <https://www.marathoncoach.com/>

Source Information:

SIC	3716
NAICS	336213

Source Categories (LRAPA Title 37, Table 1)	B-47
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	n
Compliance schedule	n

Source test [date(s)]	n
COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements

Annual report (due date)	Feb 15
NSPS Report (due date)	n
Monthly report (due dates)	n

Excess emissions report	y
Other reports	n

Air Programs

NSPS (list subparts)	n
NESHAP (list subparts)	n
CAM	n
Regional Haze (RH)	n
Synthetic Minor (SM)	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

REVIEW REPORT

1. Permittee Identification

Marathon Coach, Inc. ("the facility") operates a motor home manufacturing facility located at 91333 Coburg Industrial Way in Coburg, Oregon.

2. General Background Information

The facility operations include conversion of bus shells into recreational vehicles and executive travelers. Conversion operations include 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.

3. Reasons for Permit Action

This permit action is for the renewal of an existing Air Contaminant Discharger Permit (ACDP) which was issued on April 23, 2013 and expired on April 23, 2018. The facility submitted renewal application 63087 on August 17, 2017. The facility submitted annual reports and fees as required and the ACDP remains valid until LRAPA issues the ACDP renewal. The facility indicated in their 2017 renewal application that no changes have been made to the facility since the last renewal. Because the actual emissions for calendar year 2017 were less than 10 tons/year for each criteria pollutant, this permit action is considered a simple "low" ADCP renewal under LRAPA 37-0064(2)(a).

4. Attainment Status

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

5. Emission Unit Description

The emission units regulated by the permit are the following:

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
FG	Fiberglass Operations	Uncontrolled	2010
MAU-1	Three Natural-Gas Fired Make-up Air Units	Uncontrolled	1993

6. Enforcement History

In the last 10 years prior to the date of this review report, the facility was inspected on the dates listed in the table below and found to be in compliance with permit conditions.

Inspection Date	Inspection Type	Inspection Results
06/02/2009	Informational inspection	In compliance
01/05/2012	Informational inspection	In compliance
01/23/2012	Maintenance of compliance	In compliance

01/18/2013	Maintenance of compliance	In compliance
01/22/2013	Comprehensive Compliance Status	On schedule

An ADCP was issued on October 13, 2006 and was originally scheduled to expire on October 12, 2011. The facility was required to have submitted the renewal application 60 days prior to expiration, but submitted a late renewal application on December 14, 2012. Because the facility submitted annual reports and fees as required and LRAPA chose to not pursue formal enforcement action for the untimely renewal application submittal.

On November 24, 2008 the facility was issued Notice of Non-Compliance (NON) No. 1736 for: exceeding annual emission limit for VOC, failing to submit quarterly reports, and failure to maintain records of dust collector inspection and repair. The facility was required to submit a permit modification application within 30 days, submit semi-annual emission reports retroactive to June 1998, and immediately begin maintaining records of dust collector inspection and repair. The facility submitted the permit modification application and fees and the file was closed.

7. Performance Test Results

The facility is not required to conduct performance testing. LRAPA is not aware of any performance testing conducted at this facility.

8. Plant Site Emission Limits (PSELs)

The following annual (rolling 12-month) PSELs are detailed in the permit (all values are in tons per year).

Annual Plant Site Emission Limits (PSELs)
 (tons per year)

Source	PM	PM ₁₀	PM _{2.5}	NOx	CO	VOC	GHGs	Individual HAP	Aggregate HAP
Coach Manufacturing	24	14	9	39	99	39	74,000	9	24

- a. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with LRAPA 37-0064(3)(b) and the netting basis is zero in accordance with LRAPA 42-0040(2).
- b. A PSEL for SO₂ is not included in this permit since emissions of this pollutant are less than the respective de minimis emission rate.
- c. PSELs for PM, PM₁₀ and PM_{2.5} are included even though emissions are expected to be de minimis.
- d. A PSEL for GHGs was included because the facility has three natural-gas fired make-up air units. Two of the units are rated at 2.212 MMBtu per hour each and one of the units is rated at 2.073 MMBtu per hour. On a potential basis, the GHG emissions (as CO₂ equivalents) from these emission units would exceed the aggregate insignificant emission threshold of 2,756 short tons.
- e. The PSEL is a federally enforceable limit on the potential to emit.
- f. Recordkeeping of the parameters listed in Condition 16 of the permit and Item 16 of this review report will be used to ensure compliance with the PSELs.

LRAPA determined compliance with the PSELs based upon the following:

- To determine potential VOC emissions and the potential emissions for most federal HAPs, the calendar year with the highest-emissions from the period 2012 through 2017 was multiplied by the ratio of the maximum number of coaches the facility is capable of converting based upon their Cleaner Air Oregon submittal (24 coaches) and the number of coaches converted in the highest-emitting year since 2012 (20 coaches in 2017). Emissions prior to 2012 are not considered representative of the current production at the facility because the

facility no longer manufactures coaches. Emissions for cumene and hexamethylene-1,6-diisocyanate are based on the projected maximum year listed in the facility's Cleaner Air Oregon submittal as these pollutants have not previously been listed in the annual air emission inventory. See the calculation sheet attached to this review report.

- For other pollutants, see the calculation sheet attached to this review report.

The facility is required to record monthly usage of all VOC-containing raw materials and conduct a mass balance of VOC-containing raw material usage to determine compliance with the 12-month rolling VOC and HAP PSELS.

9. Baseline Emission Rate (BER), Netting Basis and Significant Emission Rate (SER)

The facility was not in operating during the 1978 baseline year. As a Simple ACDP for which each regulated pollutant has a generic PSEL, the facility does not have a netting basis for any of the listed pollutants.

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			Significant Emission Rate (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase over netting basis (tons/yr)	
PM	0	0	0	24	24	24	25
PM ₁₀	0	0	0	14	14	14	15
PM _{2.5}	NA	0	0	9	9	9	10
CO	0	0	0	99	99	99	100
NO _x	0	0	0	39	39	39	40
SO ₂	NA	NA	NA	NA	NA	NA	40
VOC	0	0	0	39	39	39	40
GHG	NA	NA	0	NA	74,000	74,000	75,000
Individual HAP	0	0	0	9	9	9	NA
Aggregate HAPs	0	0	0	24	24	24	NA

10. Other Emission Limitations

The permit includes general visible and particulate matter emissions limitations for the facility.

The permit includes a specific usage limitation for fiberglass production.

11. Federal Hazardous Air Pollutants (HAPs)

A major source for federal hazardous air pollutants (HAP) is a facility that has the potential to emit 10 or more tons per year of any individual federal HAP or 25 or more tons per year of the aggregate of federal HAPs. This source is not a major source of federal HAPs.

To determine potential emissions for most federal HAPs, the calendar year with the highest-emissions from the period 2012 through 2017 was multiplied by the ratio of the maximum number of

coaches the facility is capable of converting based upon their Cleaner Air Oregon submittal (24 coaches) and the number of coaches converted in the highest-emitting year since 2012 (20 coaches in 2017). Emissions prior to 2012 are not considered representative of the current production at the facility because the facility no longer manufactures coaches. Emissions for cumene and hexamethylene-1,6-diisocyanate are based on the projected maximum year listed in the facility's Cleaner Air Oregon submittal as these pollutants have not previously been listed in the annual air emission inventory. The potential HAP emissions from the facility are shown in the following table:

Pollutant	Pounds/year	Tons/year
Cumene (98-82-8)	2.20	1.1E-03
Ethyl Benzene (100-41-4)	480	0.24
Glycol Ethers (--)	960	0.48
Hexane (110-54-3)	4,200	2.1
Hexamethylene-1,6-diisocyanate (822-06-0)	2.20	1.1E-03
Methanol (67-56-1)	24.0	1.2E-02
Methyl Isobutyl Ketone (108-10-1)	1,440	0.72
Toluene (108-88-3)	5,760	2.88
Xylenes (1330-20-7)	1,920	0.96
S. 112(b) Federal HAPs (highest individual / aggregate) =		2.88 / 7.40

12. National Emission Standards for Hazardous Air Pollutants (NESHAPs)

The facility currently has PSELs for federal HAPs that limit emissions to no more than 9 tons per year for an individual federal HAP and 24 tons per year for the aggregate of all federal HAPs. As such, the facility is considered a minor or area source of federal HAPs.

The facility is not subject to the following major source NESHAPs because the facility was an area source of federal HAPs prior to the compliance date of each regulation:

- 40 CFR 63 subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations
- 40 CFR 63 subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
- 40 CFR 63 subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating Plastic Parts and Products
- 40 CFR 63 subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

On February 17, 2010 the facility submitted an Initial Notification for the purposes of 40 CFR 63 subpart HHHHHH ('6H') – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility indicated that they spray-applied metal HAP-containing coatings to motor vehicles but that they do not perform chemical stripping with methylene chloride. On March 7, 2013 the facility submitted a Petition for Exemption from the 6H rule based upon the use of 6H compliant coatings. Because the facility has certified that no spray applied coatings contain the 6H target HAPs, the facility is no longer subject to the 40 CFR 63 subpart 6H.

13. New Source Performance Standards (NSPSs)

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

14. Typically Achievable Control Technology (TACT)

LRAPA 32-008 requires an existing emission unit at a facility to meet TACT if the emissions unit has emissions of criteria pollutants greater than 10 tons per year of any gaseous pollutant or five (5) tons per year of particulate, and the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the facility is required to have a permit. The facility was previously determined in the review report for the ADCP issued on April 23, 2013 to be meeting TACT by conducting the following activities:

- a. Preventive maintenance is required for the control equipment as a means to assure effective performance.
- b. Reasonable precautions is required to prevent HAP/VOC fugitive emissions from becoming airborne including covering containers with lids when not transferring materials.

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

Because the proposed PSEs for all regulated pollutants are below the major source threshold of 250 TPY and the PM₁₀ PSEL is below the Significant Emission Rates (SER) in LRAPA Title 38, the facility is not subject to LRAPA's New Source Review (NSR) requirements for PM₁₀, nor the Prevention of Significant Deterioration (PSD) requirements for any other regulated pollutant, as applicable.

16. Recordkeeping

The facility is required to keep and maintain a record of the following information for a period of five (5) years:

Activity	Parameter	Units	Recording Frequency
Facility-wide VOC/HAP-containing material usage	Material usage	Gallons	Monthly
Facility-wide VOC/HAP-containing material usage	Density of Material	Pounds per Gallon	Maintain current information
Facility-wide VOC-containing material usage	VOC content	% by weight	Maintain current information
Facility-wide HAP-containing material usage	HAP content	% by weight	Maintain current information
Facility-wide resin and gel coat material usage	Material usage	Tons	Monthly
Natural gas combustion	Material usage	Therms or cubic feet	Monthly

- a. VOC/HAP-containing materials include, but are not limited to, coatings, lacquers, thinners, stains, topcoats, solvents, adhesives, cleaning, and wash-off materials.
- b. The density and VOC/HAP content information must be supplied from CPDS or SDS provided by the manufacturer/supplier of the VOC/HAP containing material.
- c. The previous review report stated that VOC/HAP-containing materials used in quantities of less than one (1) gallon per month may be excluded from the recordkeeping and reporting requirements in this permit condition. This exclusion is not based on regulation and has been removed from the permit.

17. Reporting Requirements

The facility is required to submit an annual report by **February 15th** each year to include the information identified in Item 16 above.

18. Public Notice

The draft permit was on public notice from December 11, 2018 to January 9, 2019. No written comments were submitted during the 30-day comment period.

JJW/cmw
01/10/19

Calculations

VOC and HAP Emissions Calculations

The Potential to Emit for the facility for VOCs and most federal HAPs were calculated by multiplying the actual annual emissions in 2017 by the ratio of the maximum number of coaches the facility is capable of converting based upon their Cleaner Air Oregon submittal (24 coaches) and the number of coaches converted in the highest-emitting year since 2012 (20 coaches in 2017). Emissions prior to 2012 are not considered representative of the current production at the facility because the facility no longer manufactures coaches. Emissions for cumene and hexamethylene-1,6-diisocyanate are based on the projected maximum year listed in the facilities Cleaner Air Oregon submittal as these pollutants have not previously been listed in the annual air emission inventory.

Pollutant	2017 Emissions (highest) tons/year	Potential to Emit tons/year
Federal HAP		
Cumene (98-82-8)	--	1.1E-03
Ethyl Benzene (100-41-4)	0.2	0.24
Glycol Ethers (--)	0.4	0.48
Hexane (110-54-3)	1.75	2.1
Hexamethylene-1,6-diisocyanate (822-06-0)	--	1.1E-03
Methanol (67-56-1)	9.8E-03	1.2E-02
Methyl Isobutyl Ketone (108-10-1)	0.6	0.72
Toluene (108-88-3)	2.4	2.88
Xylenes (1330-20-7)	0.8	0.96
S. 112(b) Federal HAPs (highest individual / aggregate) =	2.4 / 6.16	2.88 / 7.40
VOC Total =	9.0	10.8

Baghouse Emissions				Annual
		Emission	Hourly	PM/PM10/PM2.5
	Flow Rate	Factor	Emissions	Emissions
Source:	(cubic ft/min)	(0.01 gr/dscf)	(pounds)	(tons)
3 Baghouses	12719	0.01	1.09	4.78

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

Emission factor is the grain loading estimation.

Make-Up Air Units (3) Emissions

Natural Gas-Fired

	Max	Emission	Conversion	Annual
	Design capacity	Factor	Factor	Emissions
Pollutant	(cubic ft/hr)	(lbs/10 ⁶ ft ³)	(tons/lb)	(tons)

PM/PM ₁₀ /PM _{2.5}	6497	7.6	0.0005	0.2
SO ₂	6497	0.6	0.0005	0.02
NO _x	6497	100	0.0005	2.8
CO	6497	84	0.0005	2.4
VOC	6497	5.5	0.0005	0.2
	Max	Emission	Conversion	Annual
	Design capacity	Factor	Factor	Emissions
Pollutant	(MMBtu/hr)	(kg GHG/MMBtu)	(tons/kg)	(tons)
GHGs	6.50	53.11	0.0011	3325

MAUs (3) operate 8760 hours per year.

2 MAUs operate at a maximum rate of 2.212 MM BTU per hour each.

1 MAU operates at a maximum rate of 2.073 MMBTU/hr.

1 cubic foot of natural gas = 1000 BTU.

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

GHG emission factor from 40 CFR 98, Tables C-1 and C-2 adjusted for GWPs.