



# PUBLIC NOTICE

Date posted: April 17, 2024

## LRAPA Requests Comments on the Proposed Air Quality Permit for Marathon Coach, Inc.

### HOW TO PROVIDE PUBLIC COMMENT

**Facility name:** Marathon Coach, Inc.

**Permit number:** 205161

**Permit type:** Simple Air Contaminant Discharge Permit

**Comments due by:** May 23, 2024 at 5 p.m.

**Submit written comments:**

**By mail:** Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

**By email:** [permitting@lrapa.org](mailto:permitting@lrapa.org)

The Lane Regional Air Protection Agency invites the public to submit written comments on the conditions of the proposed air quality permit, known officially as a Simple Air Contaminant Discharge Permit (ACDP), for Marathon Coach, Inc. ("facility" or "Marathon Coach").

### Summary

LRAPA last issued an air quality permit to this facility on January 10, 2019, with an expiration date of January 10, 2024. The facility submitted a renewal application prior to this expiration date and LRAPA administratively extended the existing permit until a permitting decision could be made on the renewal application. Under previous rules, a Simple ACDP was valid for five (5) years from the date of issuance. Under rules that became effective on April 11, 2024, a Simple ACDP is valid for 10 years from the date of issuance.

On December 11, 2023, the facility submitted an application for a Type 2 change under subsection 34-035(2) to modify the existing Simple ACDP to include the requirements of 40 CFR part 63 subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. As part of a review of the coating materials used by the facility in preparation for this renewal, the facility determined that at least one of their coatings contained target metals regulated by this NESHAP. This change requires a modification of the existing Simple ACDP and is considered a Non-PSD/NSR Simple Technical Permit Modification under section 37-8020, Table 2, Part 4. Specific Activity Fees.

### About the facility

Marathon Coach owns and operates a motor home manufacturing facility at 91333 Coburg Industrial Way, Coburg, Oregon. The facility began operation in 1993.

### What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the tables at the end of this document.

### How does LRAPA determine permit requirements?

LRAPA evaluates types and amounts of pollutants and the facility's location and determines permit requirements according to state and federal regulations.

## **How does LRAPA monitor compliance with the permit requirements?**

This permit will require the facility to monitor pollutants using federally-, state-, and locally-approved monitoring practices and standards. The facility will be required to compile this data into an annual report for submission to LRAPA for compliance evaluation. LRAPA will also perform regular compliance inspections of the facility to assure compliance with the permit requirements.

## **How do I request a public hearing?**

If LRAPA receives written requests from 10 persons, or from an organization representing at least 10 persons, LRAPA will schedule a public hearing on the proposed permit. By default, this public hearing will be conducted virtually. LRAPA will provide a minimum of 30 days' notice of a public hearing, specifying the virtual platform to be used, to allow interested persons to submit oral or written comments.

If the requesting party wishes to add an in-person component to the virtual hearing, they must provide a justification for this request. This justification should explicitly outline the need for an in-person component, taking into consideration that virtual hearings are the default format due to the cost and resource limitations of the agency. If the justification is deemed sufficient by LRAPA, a hybrid hearing that includes both virtual and in-person components will be scheduled at a reasonable place and time to allow interested persons to submit oral or written comments.

## **What happens after the public comment period ends?**

After the public comment period ends, including any public hearing, LRAPA will consider and respond to all relevant comments received during the public comment period and may modify the proposed permit based on comments.

If a facility meets all legal requirements, LRAPA will issue the facility a final Simple ACDP.

## **Where can I get more information?**

View the proposed permit and review report at <https://www.lrapa.org/air-quality-protection/public-calendar/> or contact LRAPA at:

**Phone:** 541-736-1056

**Email:** [permitting@lrapa.org](mailto:permitting@lrapa.org)

To view the application and related documents in person at the LRAPA office in Springfield, Oregon, please call LRAPA at the phone number listed above to schedule an appointment.

## **Non-discrimination statement**

LRAPA does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities. View LRAPA's [non-discrimination policy](#).

## **Emissions limits**

**Criteria Pollutants and Greenhouse Gases:** Table 1 below presents maximum **allowable** emissions of criteria pollutants and greenhouse gases for the facility. The current emission limit reflects maximum emissions that the facility can emit under the existing permit. The proposed emission limit reflects

maximum emissions that the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit. A proposed emission limit of de minimis means that the facility does not emit this pollutant above the de minimis emission level as defined in [title 12](#).

**Table 1**

<b>Criteria Pollutant</b>	<b>Current Limit (tons/yr)</b>	<b>Proposed Limit (tons/yr)</b>	<b>2023 Actual Emissions (tons/yr)</b>
Particulate matter (PM)	24	de minimis	Not Applicable
Coarse particulate matter (PM <sub>10</sub> )	14	de minimis	Not Applicable
Fine particulate matter (PM <sub>2.5</sub> )	9	de minimis	Not Applicable
Carbon monoxide	99	2.9	0.25
Nitrogen oxides	39	3.4	0.30
Sulfur dioxide	de minimis	de minimis	Not Applicable
Volatile organic compounds	39	15	8.0
Greenhouse gases (CO <sub>2</sub> eq.)	de minimis	4,103	363

For more information about criteria pollutants, visit EPA's [Criteria Air Pollutant web page](#).

**Hazardous air pollutants:** This facility does not have the potential to be a major source of federal hazardous air pollutants (HAP) emissions. A major source of federal HAPs has potential emissions for an individual federal HAP that exceed 10 tons per year or potential emissions for the aggregate of all federal HAPs that exceed 25 tons per year. Table 2 lists the potential and actual emissions of the highest individual federal HAP and the aggregate of all federal HAPs emitted by the source. For more information about hazardous air pollutants, visit EPA's [Health Effects Notebook for Hazardous Air Pollutants](#).

**Table 2**

<b>Hazardous Air Pollutant</b>	<b>CAS Number</b>	<b>Potential Emissions (tons/yr)</b>	<b>2023 Actual Emissions (tons/yr)</b>
Toluene	108-88-3	3.86	0.43
<b>Total HAP Emissions =</b>		<b>9.39</b>	<b>2.19</b>