

Facility Name: **Blue Bird Body Company**
City: Fort Valley
County: Peach
AIRS #: 04-13-225-00001

Application #: TV-47658
Date Application Received: June 14, 2017
Permit No: 3713-225-0001-V-06-0

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Manny Patel
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Blue Bird Body Company

2. Parent/Holding Company Name

School Bus Holdings, Inc.

3. Previous and/or Other Name(s)

None known.

4. Facility Location

402 Blue Bird Blvd.
Fort Valley, Georgia 31030
(Peach County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

Blue Bird Body Company specializes in the fabrication and assembly of bus chassis and complete school and shuttle buses. A second facility (previously known as Coachworks) had previously received bus chassis from the main facility and had specialized in the custom finishing of buses to serve as corporate or private motor coaches. However, this second facility is no longer owned by Blue Bird Body Company. There are no other facilities which are contiguous or adjacent and under common control. Therefore, this one facility considered a single source. There are no applicable issues with regard to site determination. As a result of this change, all references to Coachworks have been removed in the permit.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Permit No. 3713-225-0001-V-05-0	December 21, 2012	Title V Renewal
Amendment No. 3713-225-0001-V-05-1	November 7, 2014	Increase production on existing lines to produce more buses.
Off Permit Change	December 14, 2015	Construction of two 1000 gallon diesel tank and gasoline dispensing facilities.
Amendment No. 3713-225-0001-V-05-2	May 18, 2017	Including PSD avoidance limit to become a minor source

D. Process Description

1. SIC Codes(s)

3713

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

School Buses and Similar Vehicles

3. Overall Facility Process Description

Blue Bird Body Company specializes in the fabrication and assembly of bus chassis and complete school and shuttle buses. Production processes at the facility include material and parts receiving and handling, chassis manufacturing, assembly of wheels, axles, and engines onto the chassis, shell fabrication and installation, paint application and drying, and trimming/finishing.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility was potentially a "major" source under PSD/NSR regulations, but has taken a plant-wide VOC emission limit of 250 ton per year to avoid any PSD requirements (it is not one of the 28 named source categories under PSD regulations).

The facility went through a PSD review for an increase in production and was issued a Permit Amendment No. 3713-225-0001-V-05-1 which contained BACT emission limits. However, the facility examined emissions and concluded that the emission factors used during the PSD review were incorrect. The facility requested a retroactive PSD review. As a result of that permitting action, the BACT emission limits were removed in Permit Amendment No. 3713-225-0001-V-05-2 and the 250 tpy emission limit for PSD avoidance was re-established.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	N/A			
H ₂ S	N/A			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

Because the facility is an existing major emission source for HAPs, it is subject to MACT standard 40 CFR 63 Subpart M – “*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts*”.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

A plant-wide VOC emission limit of 250 tons per year (tpy) allows the entire manufacturing site to be minor source under NSR/PSD rules.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

There are no compliance issues noted with this application.

D. Permit Conditions

Condition 2.1.1 limits the VOC emissions to 250 tons per year facility-wide in order to remain a non-major source under NSR/PSD rules.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
BO06	Black and Primer Bake Oven	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.5, 3.5.2, 5.2.2, 6.2.1 thru 6.2.17	N/A	None
BO07	Yellow Booth Bake oven	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.5, 3.5.2, 5.2.2, 6.2.1 thru 6.2.17	N/A	None
BO08	White Booth Bake Oven 1	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.5, 3.5.2, 5.2.2, 6.2.1 thru 6.2.17	N/A	None
BO09	White Booth Bake Oven 2	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.5, 3.5.2, 5.2.2, 6.2.1 thru 6.2.17	N/A	None
PB10	All American Touchup Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF10	Dry Paint Filter
PB11	Overflow Paint Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF11	Dry Paint Filter
PB27	Undercoat Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.3.7, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
PB28	Black and Primer Paint Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.3.6, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF28	Dry Paint Filter
PB29	Yellow Paint Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.3.6, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF29	Dry Paint Filter
PB30	BBCV Touch Up Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF30	Dry Paint Filter
PB31	White Booth	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	2.1.1, 3.3.1 thru 3.3.4, 3.3.6, 3.4.1 thru 3.4.4, 3.5.1, 3.5.2, 5.2.1, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	PF31	Dry Paint Filter
CS01	Wipedown Station No. 1	40 CFR 63 Subpart M 391-3-1-.02(2)(b)	2.1.1, 3.3.1, thru 3.3.4, 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2	N/A	None

CS02	Wipedown Station No. 2	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS03	Wipedown Station No. 3	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS04	Wipedown Station No. 4	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS05	Wipedown Station No. 5	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS06	Wipedown Station No. 6	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS07	Wipedown Station No. 7	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS08	Wipedown Station No. 8	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS09	Wipedown Station No. 9	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS10	Wipedown Station No. 10	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
CS11	Wipedown Station No. 11	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1, 3.3.1 thru 3.3.4, 3.3.5, 3.4.3, 3.5.2, 5.2.2	N/A	None
NW01	Naptha Wipe Operations No. 01	40 CFR 63 Subpart M MMM 391-3-1-.02(2)(b)	2.1.1	N/A	None
AD01	Adhesive Operations No. 01	391-3-1-.02(2)(b)	2.1.1	N/A	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

There are no equipment-related emission or operation caps.

Rules and Regulations Assessment:

The facility will continue to be subject to 40 CFR 63 Subpart M MMM – “*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts*”. This MACT limits the organic HAP emissions from the surface coating of miscellaneous metal parts and products based on the types of the coatings being used. At least one of the three compliance options listed below is required:

- (1) Compliant materials option.
- (2) Emission rate without add-on control option which requires each 12-month average organic HAP emission rate based on all the coatings, thinners, additives and/or cleaning materials used for a coating operation to be less than or equal to the applicable emission limit.
- (3) Use of add-on control option.

40 CFR 63 Subpart M MMM allows the Permittee to use certain combinations of the above options to comply with the HAP emission limit. Both the compliant material and the emission rate without add-on control options also allow additional compliance approaches including predominant activity emission limit and facility-specific emission limit. The Permittee currently does not use any add-on controls for compliance with this MACT. As a result, the conditions in the permit have been tailored to exclude any 40 CFR 63 Subpart M MMM conditions which

reference add-on controls. If the facility decides to utilize add-on controls in the future, the necessary conditions will need to be added to the permit.

The facility will continue to be subject to the following rules:

- Georgia Rule 391-3-1-.02(2)(ii) – VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products because the facility emits more than 100 tons per year of VOC from surface coating of miscellaneous metal parts. This rule applies to all operations classified as surface coating of miscellaneous metal parts at this facility.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emissions from Manufacturing Processes
- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide

The facility complies with Georgia Rule (g) by only combusting natural gas or propane.

C. Permit Conditions

Condition 3.3.5 of Permit Amendment No. 3713-225-0001-V-05-1 was deleted due to reference to VOC BACT limits that are no longer applicable.

- Condition 3.3.1 subjects the metal parts surface coating operations to 40 CFR 63 Subpart M.
- Condition 3.3.2 details the compliance options required by 40 CFR 63 Subpart M. This condition only includes the Compliant Material Option and Emissions Rate Without Add-on Controls. The option for Emissions Rate With Add-on Controls was not included because the facility does not have any control devices.
- Condition 3.3.3 details the 40 CFR 63 Subpart M Predominant Activity Emission Limit compliance option which applies to existing general coating operations/activities account for 90% or more of the coating activities at this facility. This approach will simplify the record keeping, compliance determination and/or reporting requirements.
- Condition 3.3.4 details the 40 CFR 63 Subpart M Facility-Specific Emission Limit option which is another compliance approach for the emission rate without add-on controls option. This condition requires the monthly calculation of a sole usage-weighted emission limit for all the existing affected sources at this facility based on a 12-month rolling average. This approach is specifically desirable for the situation that a majority quantity of the coating material used are compliant coating materials with the applicable HAP emission limit(s) while a small amount of the coating materials are not complaint materials.
- Condition 3.3.5 (previously Condition 3.3.6) limits the VOC content of the cleaning solution to 55% VOC by weight and is required for PSD avoidance.
- Condition 3.3.6 (previously Condition 3.3.7) limits guns used in the Black and Primer Paint Booth (PB28), Yellow Paint Booth (PB29) and White Paint Booth (PB31) to HVLP electrostatic guns and is required for PSD avoidance.
- Condition 3.3.7 (previously Condition 3.3.8) which limits guns used in the Undercoat Booth (PB27) to airless spray guns and is required for PSD avoidance.
- Condition 3.4.1 subjects the metal part surface coating operations at this facility to Georgia Rule (ii). This condition includes the emission limits for the coatings.

- Condition 3.4.2 details the compliance options for meeting the emission limits required by Georgia Rule (ii).
- Condition 3.4.3 subjects the facility to Georgia Rule (b).
- Condition 3.4.4 subjects the facility to Georgia Rule (e).
- Condition 3.4.5 limits the combustion sources to natural gas or propane in order to satisfy Georgia Rule (g).
- Condition 3.5.1 requires filters in the paint booths and requires daily pressure drop readings.
- Condition 3.5.2 requires the facility to minimize spills and minimize VOC emissions from cleaning solutions and cleaning materials with proper storage and disposal.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Not applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to monitor and record the pressure drop for the specified paint booths.

Condition 5.2.2 is a new condition which requires the facility to perform monthly inspections to ensure that the work practices specified in Condition 3.5.2 are being met.

C. Compliance Assurance Monitoring (CAM)

There are no control devices used for VOC emissions control; therefore, CAM is not applicable for VOC.

The total precontrolled PM emissions from all of the spray booths are estimated to be 244 tpy. When this total is divided among the spray booths, the potential precontrolled PM emissions do not exceed the major source threshold for PM emissions. Therefore, CAM is not applicable for PM.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

- Condition 6.2.1 details the VOC usage records required by Georgia Rule (ii).
- Conditions 6.2.2 details the record keeping requirements for the routine replacement of dry paint filters as specified in Condition 3.5.1.
- Conditions 6.2.3, 6.2.4 and 6.2.5 require the facility to maintain VOC usage records for the entire facility and to use these records to determine the monthly and 12-month rolling VOC emissions from the facility. Notifications are required if the facility exceeds 80% of the facility-wide limit (200 tons) at any time or 250 tons during any 12 month rolling period. These conditions are required for PSD avoidance. These conditions were modified in Permit Amendment No.3713-225-0001-V-05-2 to include all emissions units such as the wipedown stations and gasoline dispensing stations.
- Condition 6.2.6 details the semiannual compliance reports required by 40CFR63 Subpart MMMM.
- Condition 6.2.7 details the specific record keeping requirement for all the coating materials subject to the HAP emission limit(s) under 40CFR63 Subpart MMMM. These material records are necessary for the demonstration compliance with the applicable HAP emission limit(s).
- Condition 6.2.8 details the specific record keeping requirement for all the compliance options used by the facility to comply with the applicable HAP emission limit(s) under 40CFR63 Subpart MMMM. These records are necessary for the demonstration compliance with the applicable HAP emission limit(s) involved.
- Condition 6.2.9 details the recording keeping and compliance determination requirements for the compliant material option specified in Condition 3.3.2.
- Condition 6.2.10 details the compliance determination requirement for the emission rate without add-on control option specified in Conditions 3.3.2 and 3.3.4. This condition contains all the equations used in the compliance determination. Note that the actual HAP emission rate determined using Equation 3 is a 12-month rolling average, and is calculated monthly.
- Conditions 6.2.11 through 6.2.16 detail the record keeping requirements for all the coatings, thinners/additives, and/or cleaning materials subject to the Subpart MMMM, and for off-site disposed wastes accounting for HAP emission allowance. These records are necessary for the demonstration of compliance with the applicable HAP emission limit(s) involved.
- Condition 6.2.17 reemphasizes the procedure of demonstrating compliance with the facility-specific emission limit determined in accordance with Condition 3.3.4. Note that depending on the coating material usages during each of the rolling 12-month compliance periods involved, this limit will vary month by month, and therefore most likely will not be the same as those specified in Condition 3.2.1.

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

Refer to <http://gatv.georgiaair.org/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- Not applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

- Not applicable.

J. Pollution Prevention

- Not applicable.

K. Specific Conditions

- There are no additional facility-specific conditions that are not covered elsewhere.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

