

Prevention of Significant Air Quality Deterioration Review

Final Determination

September 2014

Facility Name: Blue Bird Body Company
City: Fort Valley
County: Peach
AIRS Number: 04-13-22500001
Application Number: 22073
Date Application Received: August 13, 2013



State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch

Keith Bentley – Chief, Air Protection Branch

Stationary Source Permitting Program

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BACKGROUND

On August 6, 2013, Blue Bird Body Company (hereafter Blue Bird Body Company) submitted an application for an air quality permit to increase production on existing lines to produce more buses. The facility is located at 402 Blue Bird Blvd. in Fort Valley, Peach County. Blue Bird Body Company's proposed modification to relax PSD avoidance limits, as specified per Georgia Air Quality Application No. 22073, will make the facility a major source for VOC under PSD because the potential emissions of VOC exceeding 250 tpy. Condition 2.1.1 of Permit No. 3713-225-0001-V-05-0 had contained a PSD avoidance limit which limited VOC to less than 250 tpy. Due to proposed increase in production on existing lines to produce more buses, the new potential VOC emissions will be 407 tpy.

On July 17, 2014, the Division issued a Preliminary Determination stating that the modifications described in Application No. 22073 should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the modified equipment.

The Division requested that Blue Bird Body Company place a public notice in a newspaper of general circulation in the area of the existing facility notifying the public of the proposed construction and providing the opportunity for written public comment. Such public notice was placed in *The Leader Tribune* (legal organ for Peach County) on August 13, 2014. The public comment period expired on September 12, 2014.

During the comment period, comments were received from the facility. There were no comments received from the U.S. EPA region IV or the general public.

A copy of the final permit is included in Appendix A. A copy of written comments received during the public comment period is provided in Appendix B.

BLUE BIRD BODY COMPANY COMMENTS

Comments were received from Robert Watts, Director of Environmental, Health & Safety, by letter on September 15, 2014.

“As the VOC and TAP emissions from sealants and adhesives have not been evaluated in previous applications, the facility has quantified the potential and actual VOC/TAP emissions and evaluated TAPs emissions based on the toxic modeling results in the Blue Bird Body Company PSD application Update (40 CFR §52.21(r)(4) “Relaxation”), submitted in March 2014.

Table 1-1 below shows VOC emissions summary based on the total sealant and adhesive usage at the facility in 2013.

Table 1-1: Summary of Emissions from Sealants and Adhesives

Source	Actual VOC Emissions (tpy)	Potential VOC Emissions (tpy)
Sealants and Adhesives	6.43	9.64

Detailed calculations by product usage can be found in Table 1 of the Attachment. As the sealants and adhesives are used throughout the facility, the VOC emissions with respect to the BACT analysis should be considered to be emitted out of the nearest wipedown stations (Emission Units: CS01-CS11). The use of the sealants and adhesives will not cause the facility [to] exceed the proposed wipedown station limits as specified in the Blue Bird Body Company PSD Application Update. As such, an update to the BACT is not required at this time.”

Comment 1

EPD Response. The Division has reviewed the updated Toxic Impact Assessment with the addition of the emissions from sealants and adhesives to the nearest wipedown station. The Division agrees that the potential TAP emissions from the facility do not exceed the acceptable ambient concentrations (AAC) for any pollutant.

The Division has updated the permit to note the inclusion of sealants and adhesives to the emission calculations from the wipedown stations in Condition 6.2.4.

APPENDIX A

AIR QUALITY PERMIT

3713-225-0001-V-05-1

APPENDIX B

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD