

# Part 70 Operating Permit Amendment

**Permit Amendment No.:** 3713-225-0001-V-05-1

**Effective Date:** November 7, 2014

**Facility Name:** **Blue Bird Body Company**  
402 Blue Bird Blvd.  
Fort Valley, Georgia 31030, Peach County

**Mailing Address:** Post Office Box 937  
Fort Valley, Georgia 31030

**Parent/Holding Company:** School Bus Holdings, Inc.

**Facility AIRS Number:** 04-13-225-00001

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Relaxation of the PSD avoidance limits in Condition No. 2.1.1. This permit includes conditions that specify the requirements of 40 CFR 52.21(j) (Best Available Control Technology).

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 3713-225-0001-V-05-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 22073 dated August 6, 2013; any other applications upon which this Permit Amendment or Permit No. 3713-225-0001-V-05-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 9 pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 3713-225-0001-V-05-0.

[Signed]

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Director  
Environmental Protection Division

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**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

The facility is requesting the removal of the PSD avoidance limits for facility-wide VOC emissions. Condition No. 2.1.1 will be deleted, and Condition Nos. 6.1.7 and 6.2.5 will be modified to delete the references to the facility-wide 250 tpy VOC limit.

The relaxation of the VOC limits in Condition No. 2.1.1 will make the facility major source of VOC under the “Prevention of Significant Deterioration (PSD)” regulations (40 CFR 52.21). Per the PSD regulations major sources have to go through a technology review to determine the Best Available Control Technology (BACT) and the limits in this permit represent BACT. The facility has submitted a PSD application for the above emission units that include the required modeling and a BACT review.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

**DELETED CONDITION**

2.1.1 [Deleted]

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### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.1 Additional Emission Units

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) 40 CFR 52.21(j)	3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.4, 3.4.1 thru 3.4.4, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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

## Title V Permit Amendment

Blue Bird Body Company

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Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 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) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS02	Wipedown Station No. 2	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS03	Wipedown Station No. 3	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS04	Wipedown Station No. 4	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS05	Wipedown Station No. 5	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS06	Wipedown Station No. 6	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS07	Wipedown Station No. 7	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS08	Wipedown Station No. 8	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS09	Wipedown Station No. 9	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS10	Wipedown Station No. 10	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	N/A	None
CS11	Wipedown Station No. 11	40 CFR 63 Subpart M 391-3-1-.02(2)(b) 40 CFR 52.21(j)	3.3.1 thru 3.3.5, 3.4.1, 3.4.2, 3.4.3, 3.5.2, 5.2.2, 6.1.7, 6.2.1 thru 6.2.17	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.

### 3.3 Equipment Federal Rule Standards

#### Best Available Control Technology

##### **NEW CONDITION**

- 3.3.5 The Permittee shall not discharge or cause the discharge into the atmosphere from preparation and spray booth operations at the facility, VOC emissions in excess of the following during any twelve consecutive months:  
[40 CFR 52.21 – PSD/BACT]

Emission Unit ID No.	VOC BACT Emission Limits (tons/12-month rolling total)
PB10	25.00
PB11	13.80
PB27	14.18
PB28	56.00
PB29	50.00
PB30	27.00
PB31	31.00
CS01	20.00
CS02	19.40
CS03	21.00
CS04	21.00
CS05	21.00
CS06	12.00
CS07	21.00
CS08	10.81
CS09	10.81
CS10	10.81
CS11	12.00

##### **NEW CONDITION**

- 3.3.6 The VOC content of the cleaning solvent used in the wipe down stations (CS01-CS11) shall not exceed 55% by weight.  
[40 CFR 52.21 – PSD/BACT]

##### **NEW CONDITION**

- 3.3.7 The Permittee shall only use HVLP, electrostatic spray guns for coating applications in Black and Primer Paint Booth (PB28), Yellow Paint Booth (PB29) and White Paint Booth (PB31).  
[40 CFR 52.21 – PSD/BACT]

##### **NEW CONDITION**

- 3.3.8 The Permittee shall only use airless spray guns for coating applications in the Undercoat Booth (PB27).  
[40 CFR 52.21 – PSD/BACT]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements****MODIFIED CONDITION**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(iii) 391-3-1-.02(2)(a)8., and 391-3-1-.02(2)(ii)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - i. None required to be reported in accordance with Condition 6.1.4.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. [Deleted]
  - ii. For miscellaneous metal parts surface coating lines/booths, any period during which the average VOC emissions from all the coating lines/booths exceed the applicable limit(s) specified in Rule 391-3-1-.02(2)(ii).
  - iii. The use of any coating in Emission Units ID Nos. PB10, PB11, PB27, PB28, PB29, PB30, PB31, and CS01-CS11 that has a VOC content exceeding the limits specified in Condition No. 3.4.1.
  - iv. Exceedances of 40 CFR 63 Subpart M are reported via Condition 6.2.6.
  - v. Exceedances of VOC BACT emission limits specified in Condition 3.3.5.
  - vi. Exceedances of the VOC content limit for the cleaning solvent specified in Condition 3.3.6.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
  - i. Any instance of failure to follow the dry paint filter monitoring and/or replacement requirements as set forth in Conditions 3.5.1 and 5.2.1.



- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
  - i. Any instance of failure to comply with work practice standards in Condition 3.5.2 as indicated by inspections required by Condition 5.2.2;

## 6.2 Specific Record Keeping and Reporting Requirements

### MODIFIED CONDITION

- 6.2.3 The Permittee shall maintain monthly usage records of all VOC materials utilized for the entire facility at this site. The records shall include the total weight of each material used, *paint booth in which material was used*, the VOC, solids and/or water content of each material, as required for the determination of appropriate VOC emission rates to demonstrate compliance with the applicable VOC emission limits in this permit. The Permittee may subtract from the monthly usage the VOC content of any material disposed as containerized waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste be included as part of the record. All calculations used to determine material usages should be kept as part of the monthly record and/or daily record. These records shall be kept available for inspection or submittal for five (5) years from the date of record. [391-3-1-.02(6)(b)1. & 391-3-1.03(2)(c)]

### MODIFIED CONDITION

- 6.2.4 The Permittee shall use the records required in Condition 6.2.3 to calculate combined total monthly VOC emissions *for each paint booth and wipedown station (Emission Unit ID Nos. PB10, PB11, PB27, PB28, PB29, PB30, PB31, and CS01-CS11)*. All demonstration calculations used in the calculations shall be kept as part of the records required in this condition.

$$VOC_i = \sum_{i=1}^n (Content_i)(Quantity_i)/(2,000lbs / ton)$$

Where,

- VOC<sub>i</sub> = Monthly VOC Emissions per Paint Booth or Wipedown Station *i*, tons/month
- Content<sub>i</sub> = VOC Content of VOC-containing material *i*, lb/gal
- Quantity<sub>i</sub> = Quantity of VOC-containing material *i* used in each paint booth and wipedown station (including sealants and adhesives) for the month, gal
- n* = number of materials used

## Title V Permit Amendment

### MODIFIED CONDITION

6.2.5 The Permittee shall use monthly VOC emission records required in Condition 6.2.4 to determine the total VOC emissions from *each paint booth and wipedown station (Emission Unit ID Nos. PB10, PB11, PB27, PB28, PB29, PB30, PB31, and CS01-CS11)* for each twelve consecutive month period. Each combined 12 month total shall be included in the quarterly report specified in Condition 6.1.4. The Permittee shall notify the Division in writing if the 12-month rolling total VOC emissions for *each paint booth* equal or exceeds 80% of the emission limits specified in Condition 3.3.5 as shown below.

Emission Unit ID No.	Reporting Limit (80% of VOC Emission Limit) (tpm)
PB10	20.00
PB11	11.04
PB27	11.34
PB28	44.80
PB29	40.00
PB30	21.60
PB31	24.80
CS01	16.00
CS02	15.52
CS03	16.80
CS04	16.80
CS05	16.80
CS06	9.60
CS07	16.80
CS08	8.65
CS09	8.65
CS10	8.65
CS11	9.60

This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 3.3.5. In addition, the Permittee shall report such instance(s) in accordance with Condition 6.1.7d. This report shall include an explanation(s) of what action(s) the Permittee has taken accordingly to maintain compliance with the applicable emission limit(s) in Condition 3.3.5. The Permittee shall notify the Division in writing if the 12-month rolling total VOC emissions from any paint booth exceeds the following:

Emission Unit ID No.	VOC BACT Emission Limits (tons/12-month rolling total)
PB10	25.00
PB11	13.80
PB27	14.18
PB28	56.00
PB29	50.00
PB30	27.00
PB31	31.00
CS01	20.00
CS02	19.40
CS03	21.00
CS04	21.00
CS05	21.00

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Emission Unit ID No.	VOC BACT Emission Limits (tons/12-month rolling total)
CS06	12.00
CS07	21.00
CS08	10.81
CS09	10.81
CS10	10.81
CS11	12.00

This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 3.3.5. In addition, the Permittee shall report such instance(s) as exceedance(s) in accordance with Condition 6.1.7.

[391-3-1-.02(6)(b)1. & 391-3-1.03(2)(c)]