

Facility Name: **Blue Bird Body Company**

City: Fort Valley

County: Peach

AIRS #: 04-13-225-00001

Application #: 901005

Date SIP Application Received: July 11, 2025

Date Title V Application Received: July 11, 2025

Permit No: 3713-225-0001-V-07-2

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
3713-225-0001-V-07-0	July 9, 2024	Title V Renewal
3713-225-0001-V-07-1	June 18, 2025	Change the site-wide VOC emission limitation to an equipment-specific VOC emission limitation

B. Regulatory Status

1. PSD/NSR/RACT

Blue Bird Body Company (hereinafter “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 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 VOC emission limit for PSD avoidance was re-established.

The facility is not subject to Georgia Rule (tt) – *VOC Emissions from Major Sources* or Georgia Rule (yy) – *Emissions of Nitrogen Oxides from Major Sources* because the facility is located in Peach County which is not one of the targeted counties for applicability.

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}	✓			✓

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SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	N/A			
H ₂ S	N/A			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

This modification is for the construction and operation of EV Bus manufacturing. The proposed manufacturing site (hereinafter “Blue Bird Type-C ICE/EV Plant,” “Type-C ICE/EV”) will be adjacent to the existing Type-D bus manufacturing site (hereinafter “Main Plant”). The facility will fabricate and assemble new “Type-C” internal combustion engine (ICE) and electric vehicle (EV) school buses, shuttles, and other custom ordered vehicles.

The manufacturing process involves two assembly lines working simultaneously: the first line assembling bus chassis and the second line assembling the bus body. Assembly line operation for chassis fabrication involves frame, axel, suspension, and fluid buildup, while the bus body assembly line constructs the bus floor, windows, trim, air conditioning, and seating. Once the body and chassis are assembled, the components are attached, and the school bus enters into the paint, wiring, and repair assembly line. The finished bus is transferred out of the assembly line and into the repair bay (if necessary) before being sent to the finished bus lot. The facility will not manufacture electric vehicle batteries on the facility premises. The proposed Type-C ICE/EV manufacturing site will contain six paint booths, three bake ovens, five wipedown stations and miscellaneous chemical usage.

The proposed manufacturing site will have the ability to manufacture Type-D school buses; however, Type-D bus manufacturing would only occur at the proposed plant in the event of prolonged shutdown at the Main Plant.

B. Emissions Change

Potential VOC and HAP emissions for the proposed manufacturing site was based on coating usage at the existing site. The worst-case coating was used to estimate VOC and HAP emissions. The proposed site will have six paint booths while the existing site has nine booths. A material balance was used to determine emissions and was based on the VOC/HAP content from the Safety Data Sheets (SDS) or Environmental Data Sheets (EDS), maximum coating usage (gallon per bus) and the maximum buses coated per hour. The potential emissions were based on 8,760 hours per year.

Potential particulate matter (PM) emissions were calculated using the solids content of each coating, maximum coating usage (gallon per bus) and the maximum buses coated per hour. The potential emissions were based on 8,760 hours per year. A transfer efficiency of 65% was included for the use of HLVP applicators. A control efficiency of 99% was based on the use of filters to control PM emissions in the booths. Though the application referenced a fallout factor, this is not included in the emission changes in the following table.

Cleaning solvent is used to prepare the vehicle surface prior to coating. The proposed manufacturing site will have five wipedown stations. These occur outside of the paint booths. Potential VOC emissions from the cleaning solvent were based on a material balance of the VOC content from the SDS and an estimate of projected usage based on the existing site’s usage.

Potential emissions from the three bake ovens and the two infrared ovens were calculated using the maximum heat capacities of the ovens, AP-42 emissions factors for natural gas combustion and 8,760 hours of operation per year.

Miscellaneous chemical usage included the adhesive operations which uses adhesive to adhere the floor mats to the bus and naphtha wipe operations which uses the solvent outside of the wipedown stations. Potential VOC/HAP emissions from miscellaneous chemical usage were based on a material balance of the VOC content from the SDS and an estimate of projected usage based on the existing site's usage.

Since the proposed Type-C ICE/EV plant has a potential VOC emissions greater than 250 tpy, the facility proposed to cap VOC emissions from the entire Type-C ICE/EV plant below 250 tpy so that they can avoid a PSD review by taking the one-time doubling allowance.

Because the filters for the paint booths are necessary to ensure that PM emissions do not exceed 250 tpy, the use of the filters during painting will be required for PSD avoidance.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	< 6.07	6.07
PM ₁₀	Yes	< 6.07	6.07
PM _{2.5}	Yes	< 6.07	6.07
SO ₂	Yes	< 0.10	0.10
VOC	Yes	< 249	249
NO _x	Yes	< 17.18	17.18
CO	Yes	< 14.43	14.43
TRS	No	--	--
H ₂ S	No	--	--
Individual HAP	Yes	< 1.63	1.63
Total HAPs	Yes	< 26.01	26.01

C. PSD/NSR Applicability

This modification is not subject to PSD review because the increase in VOC emissions is limited to less than 250 tpy for a one-time doubling for PSD avoidance. The existing main plant is a minor source under PSD, and the modification itself is not a major source.

III. Facility Wide Requirements

A. Emission and Operating Caps:

There are no new emissions and operating caps due to this application.

B. Applicable Rules and Regulations

For projects with quantifiable increases in toxic air pollutant (TAP) emissions, an air dispersion modeling analysis is generally performed to demonstrate that off-property impacts are less than the established Acceptable Ambient Concentration (AAC) values. The TAP analysis is an assessment of off-property impacts due to facility-wide emissions of any TAP emitted by a facility.

The applicant calculated the facility-wide emissions of compounds identified as TAP in the Georgia Air Toxics Guidelines, using estimated short and long term emission rates. The combined emissions from the existing manufacturing and the proposed manufacturing were used in the evaluation. For natural gas combustion sources, the emissions are conservatively estimated at 8,760 hr/yr. For painting and coating, the TAP emissions are estimated based on the material TAP content and the estimated controlled emissions rates. A comparison of the potential emission rates of the pollutants were compared to the 20% of the minimum emission rate (MER) list in Appendix A of the guidelines as a screening tool which is used for emissions not vented through unobstructed stacks. Due to the possibility that the future stacks may be obstructed, the TAP emissions rates were conservatively compared to 20% of their respective MERs. If the emissions for a TAP are below the 20% MER, then no further evaluation is needed for that pollutant to ensure that public health is protected.

Table 4: Evaluation of Potential Emissions to MER

Pollutant	CAS	Emission Rate (lb/yr)	MER (lb/yr)	20% MER (lb.yr)	Exceeding 20% MER
Acetic acid	64197	629.00	54,575.00	10,915.00	No
Methanol	67561	0	30,126.73	6,025.35	No
Isopropyl alcohol	67630	188,552.00	114,000.00	22,700.00	Yes
Acetone	67641	556,861.00	278,100.38	55,620.08	Yes
1-Butanol	71363	5,246.00	34,750.38	6,950.08	No
Propane	74986	161.00	208,599.62	41,719.92	No
1,1-Difluoroethane	75376	31.10	9,733,200.00	1,946,640.00	No
Methyl methacrylate	80626	2.47	170,331.00	34,066.20	No
Dibenzoyl peroxide	94360	0	57.94	11.59	No
Ethylbenzene	100414	1,069.00	243,000.00	48,700.00	No
1-Methoxy-2-propanol	107982	41,502.00	486,660.00	97,332.00	No
Toluene	108883	43,142.00	1,216,650.00	243,330.00	No
Propyl acetate	109604	28,283.00	97,340.00	19,468.00	Yes
Methyl amyl ketone	110430	85,400.00	53,877.69	10,775.54	Yes
n-Hexane	110543	44,202.00	170,000.00	34,100.00	Yes
Cyclohexane	110827	6,445.00	1,459,980.00	291,996.00	No

Pollutant	CAS	Emission Rate (lb/yr)	MER (lb/yr)	20% MER (lb.yr)	Exceeding 20% MER
2-Butoxyethanol	111762	26,962.00	3,160,000.00	633,000.00	No
n-Butyl Acetate	123864	128,625.00	82,252.30	16,450.46	Yes
n-Heptane	142825	23,391.00	231,766.54	46,353.31	No
Tert-butyl acetate	540885	81,113.00	110,086.90	22,017.38	Yes
Calcium dihydroxide	1305620	4.68	579.40	115.88	No
Xylenes	108383	6,614.00	24,333.00	4,866.60	Yes
Carbon black	1333864	182.00	403.96	80.79	Yes
Copper	7440508	5.27	116.81	23.36	No
Benzene	71432	1.44	31.60	6.33	No
Formaldehyde	50000	51.50	22.10	4.42	Yes
Naphthalene	91203	4.20E-01	729.99	146.00	No
Arsenic	7440382	1.37E-01	5.67E-02	1.13E-02	Yes
Barium	7440393	2.27	57.92	11.58	No
Beryllium	7440417	8.24E-03	9.73E-01	1.95E-01	No
Cadmium	7440439	7.60E-01	1.35	2.71E-01	Yes
Chromium VI Particulate	18540299	3.85E-02	24.3	4.86	No
Chromium II and III Compounds	7440473	9.20E-01	58.40	11.68	No
Cobalt	7440484	5.77E-02	11.70	2.34	No
Mercury	7439976	1.79E-01	73.00	14.60	No
Manganese	7439965	2.60E-01	12.20	2.43	No
Molybdenum	7439987	7.60E-01	1,738.21	347.64	No
Nickel	7440020	1.44	38.60	7.73	No
Selenium	7782492	1.65E-02	23.40	4.67	No

Acetone, arsenic, n-butyl acetate, tert-butyl acetate, cadmium, carbon black, formaldehyde, n-hexane, isopropyl alcohol, methyl (n-amyl) ketone, propyl acetate, and xylene had potential emissions that exceeded the 20% MER; therefore, a modeling analysis was needed for these pollutants. AERMOD was used to model the emissions which was reviewed by the Air Protection Branch's Data and Modeling Unit (DMU). The maximum ground level concentrations of acetone, arsenic, n-butyl acetate, tert-butyl acetate, cadmium, carbon black, formaldehyde, n-hexane, isopropyl alcohol, methyl (n-amyl) ketone, propyl acetate, and xylene were below the associated acceptable ambient concentrations (AAC); therefore, the TIA passed the evaluation.

Table 5: TAP MGLC Assessment

TAP	Averaging Period	AAC (µg/m ³)	Max Modeled Conc. (µg/m ³)	Receptor UTM Zone: <u>17</u>	
				Easting (m)	Northing (m)
Acetone	15-minute	178,200	3,868.46	229,466.14	3,607,001.17
	24-hour	5,714	727.66	229,451.87	3,605,888.68
Arsenic	15-minute	0.2	0.00038	229,334.40	3,607,001.85
	Annual	0.000233	0.00001	229,670.56	3,606,778.23

TAP	Averaging Period	AAC ($\mu\text{g}/\text{m}^3$)	Max Modeled Conc.	Receptor UTM Zone: <u>17</u>	
n-Butyl Acetate	15-minute	95,000	668.02	229,598.82	3,605,864.25
	24-hour	1,690	108.124	229,563.31	3,605,833.40
tert-Butyl Acetate	24-hour	2,262	55.525	229,290.49	3,607,002.07
Cadmium	15-minute	30	0.002112	229,334.40	3,607,001.85
	Annual	0.00556	0.00006	229,670.56	3,606,778.23
Carbon Black	24-hour	8.3	0.314	229,391.74	3,606,161.48
Formaldehyde	15-minute	245	0.144	229,334.40	3,607,001.85
	Annual	0.0909	0.00426	229,670.56	3,606,778.23
n-Hexane	15-minute	17,600	456.967	229,466.14	3,607,001.17
	Annual	700	15.28	229,669.85	3,605,925.95
Isopropyl Alcohol	15-minute	98,000	1,379.46	229,466.14	3,607,001.17
	24-hour	2,333	277.146	229,705.40	3,605,958.34
Methyl (n-amyl) Ketone	24-hour	1,107	86.679	229,563.31	3,605,833.40
Propyl Acetate	15-minute	105,000	210.465	229,466.14	3,607,001.17
	24-hour	2,000	45.337	229,705.40	3,605,958.34
Xylene	15-minute	65,500	87.25	229,422.23	3,607,001.40
	Annual	100	1.78	229,670.56	3,606,778.23

C. Compliance Status

There are no compliance issues noted during this application.

D. Permit Conditions

There are no new facility wide permit conditions due to this application.

IV. Regulated Equipment Requirements**A. Brief Process Description**

Blue Bird Body Company (hereinafter “facility”) 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.

B. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
		TYPE-C ICE/EV BUS		
C-PB01	Undercoat Paint Booth No. 1	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF01	Dry Paint Filter
C-PB02	White Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF02	Dry Paint Filter
C-PB03	Repair Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF03	Dry Paint Filter
C-PB04	Prime Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF04	Dry Paint Filter
C-PB05	Black Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF05	Dry Paint Filter
C-PB06	Undercoat Paint Booth No. 2	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(ii)	C-PF06	Dry Paint Filter
C-BO01	Type-C ICE/EV Bake Oven #1 (10 MMBtu/hr natural gas, direct-fired)	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None
C-BO02	Type-C ICE/EV Bake Oven #2 (10 MMBtu/hr natural gas, direct-fired)	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None

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Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
C-BO03	Type-C ICE/EV Bake Oven #3 (10 MMBtu/hr natural gas, direct-fired)	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None
C-IR01	Infrared Baking Oven (5 MMBtu/hr natural gas, direct-fired)	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None
C-IR02	Infrared Baking Oven (5 MMBtu/hr natural gas, direct-fired)	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	N/A	None
C-CS01	Type-C ICE/EV Wipedown Station #1	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-CS02	Type-C ICE/EV Wipedown Station #2	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-CS03	Type-C ICE/EV Wipedown Station #3	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-CS04	Type-C ICE/EV Wipedown Station #4	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-CS05	Type-C ICE/EV Wipedown Station #5	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-AD01	Adhesive Usage	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
C-NW01	Naphtha Wipes	40 CFR 63 Subpart A 40 CFR 63 Subpart M 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None

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

C. Equipment & Rule Applicability

Emission and Operating Caps –

All equipment shown in Table 3.1.1 of Permit Amendment No. 3713-225-0001-V-07-2 and any insignificant activities for the Type-C ICE/EV Bus manufacturing facility will be limited to less than 250 tpy in order to avoid PSD review, under the PSD one-time doubling provision.

Applicable Rules and Regulations -
Rules and Regulations Assessment:

The additional proposed equipment will be subject to 40 CFR 63 Subpart M MMM – “*National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts.*” The rule applies to the surface coating of any miscellaneous metal parts or products and includes surface coating and any associated activities, such as surface preparation, cleaning, mixing, and storage at a HAP major source. This MACT limits the organic HAP emissions from the surface coating of miscellaneous metal parts and products based on the types of coatings being used. The proposed additional equipment for the facility will be subject to emission limits listed for an existing affected source as discussed in 40 CFR 63.3890(b)(1) and 40 CFR 63.3890(b)(2). The 12-month limits are no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used for general use coating and no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used for high performance coatings.

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. (The facility does not choose this 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. All proposed equipment for the adjacent Type-C ICE/EV Bus manufacturing facility will be subject to 40 CFR 63 Subpart M MMM and are detailed in existing Conditions 3.3.1 through 3.3.4 of Permit No. 3713-225-0001-V-07-0.

The following rules are detailed in Permit No. 3713-225-0001-V-07-0 and will apply to the applicable proposed equipment:

- Georgia Rule 391-3-1-.02(2)(b) – *Visible Emissions* will apply to all the proposed equipment at the adjacent Type-C ICE/EV Bus manufacturing facility and is existing Condition 3.4.3.
- 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 which will include proposed Paint Booths C-PB01 through C-PB06 and are detailed in existing Conditions 3.4.1 and 3.4.2.
- Georgia Rule 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes* will apply to the proposed Paint Booths C-PB01 through C-PB06, the three proposed bake ovens, two proposed infrared ovens, five wipedown stations, adhesive usage, and naphtha wipes, and is existing Condition 3.4.4.

- Georgia Rule 391-3-1-.02(2)(g) – *Sulfur Dioxide* will apply to the three proposed bake ovens and two proposed infrared ovens which will comply by only combusting natural gas or propane and is existing Condition 3.4.5.

Because the three proposed bake ovens and two proposed infrared ovens will be direct-fired, these will not be subject to Georgia Rule 391-3-1-.02(2)(d) – *Fuel-Burning Equipment*.

The facility is not subject to 40 CFR 60 Subpart MM - *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations* or 40 CFR 60 Subpart MMA - *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operation or which Construction, Modification or Reconstruction Commenced After May 18, 2022* because these rules apply only to the surface coating of vehicles classified as automobiles or light-duty trucks, defined as vehicles with a gross vehicle weight rating (GVWR) of 3,850 kilograms or less. The Blue Bird Type-C ICE/VE Plant manufactures school buses which exceed the GVWR for applicability.

D. Permit Conditions

- Condition 3.2.2 is a new condition which limits the VOC emissions from the emission units in Table 3.1.1 of this amendment for the proposed equipment of an adjacent Type-C ICE/EV Bus manufacturing facility to less than 250 tpy. This limit is a PSD avoidance for the allowance of a “one-time doubling.”
- Condition 3.2.3 is a new condition which requires the use of the filter during operation of the paint booths to control PM emissions. This condition ensures PSD avoidance for PM emissions.
- Condition 3.5.1 requires filters in the paint booths and requires daily pressure drop readings and was modified to include the filters for proposed Paint Booths C-PB01 through C-PB06.
- Condition 3.5.4 is a new condition which requires facility to use HVLP, electrostatic spray guns for coating application in Paint Booths C-PB01 through C-PB06 which is the type of detailed in Application No. 901005.

V. Testing Requirements (with Associated Record Keeping and Reporting)

There are no additional testing requirements due to this application.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Condition 5.2.1 requires the facility to monitor and record the pressure drop across the filters for the specified paint booths and was modified to include proposed Paint Booths C-PB01 through C-PB06.

VII. Other Record Keeping and Reporting Requirements

The record keeping and reporting requirements for the VOC usage records required by Georgia Rule (ii) is included in existing Condition 6.2.1 of Permit No. 3713-225-0001-V-07-0.

The record keeping requirements for proposed filters are included in Condition 6.2.2 of Permit No. 3713-225-0001-V-07-0.

The record keeping and reporting requirements of 40 CFR 60 Subpart M are included in existing Conditions 6.2.6 through 6.2.17 of Permit No. 3713-225-0001-V-07-0.

The following explains the changes in existing conditions and newly added conditions:

- Condition 6.1.7b.ii. was removed since this is already included in Condition 6.1.7b.iii.
- Condition 6.1.7b.iii. was modified to include proposed Paint Booths C-PB01 through C-PB06 to the exceedance reporting requirement for exceeding the VOC content limit of Georgia Rule (ii).
- Condition 6.1.7b.iv. was removed since the requirement is already included in Condition 6.2.6.
- Condition 6.1.7b.vi. is a new condition for the exceedance reporting requirement when the emission units in Table 3.1.1 of this amendment for an adjacent Type-C ICE/EV Bus manufacturing facility exceed 249 tpy.
- Conditions 6.2.20, 6.2.21 and 6.2.22 are new conditions which require the facility to maintain VOC usage records for the emission units listed in Table 3.1.1 of Permit Amendment No. 3713-225-0001-V-07-2 and any insignificant activities for the Type-C ICE/EV Bus manufacturing facility and to use these records to determine the monthly and 12-month rolling VOC emissions from the emission units listed in Table 3.1.1 of Permit Amendment No. 3713-225-0001-V-07-2 and any insignificant activities for the Type-C ICE/EV Bus manufacturing facility. Notifications are required if the facility exceeds 80% of the 250 tpy for the adjacent Type-C ICE/EV Bus manufacturing facility (200 tons) at any time. These conditions are required for PSD avoidance.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//