

Air Permit Review

Permit Issue Date: **PROPOSED**
CDS ID No. 3708100822

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100822
Inspector's Name: Steve Moser
Date of Last Inspection: 03/02/2005
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Thomas Built Buses - Courtesy Road Facility Address: Thomas Built Buses - Courtesy Road 1408 Courtesy Road High Point, NC 27260 SIC: 3713 / Truck And Bus Bodies NAICS: 336211 / Motor Vehicle Body Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: Title V Renewal		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100822.05B Date Received: 08/01/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03209/T13 Existing Permit Issue Date: 05/08/2001 Existing Permit Expiration Date: 05/01/2006		
Dwight Bradshaw Environmental Manager (336) 881-6507 P O Box 2450 High Point NC, 27261	Jeff Allen Vice President of Operations (336) 889-4871 PO Box 2450 High Point NC, 27261	Dwight Bradshaw Environmental Manager (336) 881-6507 P O Box 2450 High Point NC, 27261			
Review Engineer: Michael Brandon, P.E. Review Engineer's Signature: _____		Date: August 17, 2005	Comments / Recommendations: Issue 03209/T14 Permit Issue Date: PROPOSED Permit Expiration Date: 5yrs after issue		

I. Purpose of Application

The Permittee has requested a renewal of their Title V operating permit.

II. Analysis

There were no reported changes to this facility. The facility is in an area (EAC County) that is designated non-attainment for VOC and NOx and attainment for all other criteria pollutants. The facility is in compliance with all applicable regulations and permit conditions for wood working operations, particulate emissions, sulfur dioxide emissions, opacity, NSPS for Subpart Dc boilers, emissions of volatile organic compounds, odors, and TAPs (15A NCAC 2D .0512, 2D .0515, 2D .0516, 2D .0521, 2D .0524, 2D .0958, 2D .1806, 2Q .0700).

The future MACT for Surface Coating of Miscellaneous Metal parts and products apparently applies to this facility because it is potentially major for HAPs. A future compliance provision was added to the permit with a compliance date of January 2, 2007 pursuant to 40 CFR 63, Subpart Mmmm. In addition to the addition of a future compliance date for MACT, a requirement to submit a facility wide toxic air pollutant assessment in accordance with the last applicable MACT provisions of 15A NCAC 2Q. 0705 was included.

The wood working operations have nowhere near the operating capacity to be subject to Compliance Assurance Monitoring (CAM) requirements.

III. Permit Changes

The Insignificant Activities List was updated to provide ID Nos. for sources as listed in the IBEAM ESM.

Requirements pertaining to Federal Enforceable Only 40 CFR 52 Subpart II, "NORTH CAROLINA IMPLEMENTATION PLAN" for the old 2D .0518 photochemically reactive VOC rule were removed. There were no controls installed because of this rule.

Page 3. The Equipment list was updated to provide ID Nos. for sources as listed in the IBEAM ESM.

Pages 4-8. Section 2.1 B. was modified to incorporate Section 2.1 D. Sections 2.2 A. through 2.2 D. of the previous permit because the applicable requirements were identical in 2.1 B. and 2.1 D. and all Section 2.2 requirements apply only to the operations listed in 2.1 B and 2.1D.

Page 6. The citation for odor control was changed to 2D .0958 in Section 2.1 B 3.

Pages 6-7. Monitoring, recordkeeping, and reporting, requirements were added to Section 2.1 B.4. for work practices for sources of volatile organic compounds.

Page 7 Section 2.1 B.6 was added for the future compliance date of the MACT for Surface Coating of Miscellaneous Metal Parts and Products.

Pages 7-8 Section 2.1 B.7. was added for the future facility wide assessment of TAPs with the submittal of the notification of compliance with the last applicable MACT (March 28, 2008).

Page 10-17. The permit was updated with the latest version of "General Conditions".

Please note that the due date in general condition "P" for compliance certification and the due date for each first semi annual report was changed to March 1.

IV. Recommendations

Renew the Title V operating permit for another five-year term.