

## Air Permit Review

**Permit Issue Date: PROPOSED**  
**CDS ID No.: 3708100810**

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100810  
**Inspector's Name:** Steve Moser  
**Date of Last Inspection:** 07/22/2005  
**Compliance Code:** 4/In Compliance - Certification

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Thomas Built Buses - Fairfield Road  <b>Facility Address:</b> Thomas Built Buses - Fairfield Road 715 West Fairfield Road High Point, NC 27261  <b>SIC:</b> 3713 / Truck And Bus Bodies <b>NAICS:</b> 336211 / Motor Vehicle Body Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 4100810.05A <b>Date Received:</b> 07/27/2005 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 05727/T09 <b>Existing Permit Issue Date:</b> 03/02/2004 <b>Existing Permit Expiration Date:</b> 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			
<b>Review Engineer:</b> Mike Brandon		<b>Comments / Recommendations:</b>			
<b>Review Engineer's Signature:</b> _____		<b>Issue</b> 05727/T10 <b>Permit Issue Date:</b> PROPOSED <b>Permit Expiration Date:</b> 5 yrs after issue			
<b>Date:</b> _____					

**1. Purpose of Application**

The Permittee is requesting renewal of the Title V permit and some changes as follows:

- a. the removal of two insignificant sources (see changes table);
- b. the redesignation of source ID Nos. and source descriptors for 90 emissions sources, 74 of which were removed from the permit as categorically exempt pursuant to 2D .0503(7) (see changes table);
- c. the addition of five gas-fired air make up units that are categorically exempt pursuant to 2D .0503(7);
- d. change reporting requirements for the PSD and 112(g) avoidance conditions from quarterly to semi annual; and
- e. remove the monitoring , recordkeeping and reporting requirements for the xylene facility cap (2D .1100 avoidance).

**2. Facility Description**

This facility manufactures buses (primarily school buses).

**3. Application Chronology**

The application chronology is detailed on the attached IBEAM Report.

**4. Permit Modification/Changes**

In regard to the Permittee's requested changes, the RCO and the WSRO have the following responses:

- a. The quarterly reporting for the PSD and 112(g) avoidance conditions was changed to semi annual.
- b. The justification for removal of monitoring, recordkeeping, and reporting of xylene emissions presented by the Permittee shows that potential emission of xylene cannot exceed 16.4 pounds per hour and 190.0 pounds per day on a time averaged basis. It does not conclusively demonstrate that instantaneous emissions could not be greater than the allowable. Their records do show that the maximum daily emission of xylene has been 30.2 pounds, which is less than the daily allowable, but greater than the hourly allowable. If the minimum rate of bus processing is used (approximately one every 1.5 hours = 12/8) and the emissions assumed to be equally prorated among the minimum

buses processed (30.2/8.2) then the resulting hourly emission could conservatively be estimated to be 3.68 pounds per bus and (3.68/1.5) 2.5 pounds per hour of xylene. As these records are based on the production of about 14,000 buses in 2004 and the permitted allowable is 15,000 buses (until compliance with MACT and facility wide assessment of TAPs), it appears that the xylene TAP limit will not be exceeded unless work practices are substantially modified to use more xylene. Monitoring and recordkeeping will consist of maintaining general xylene use records for review as may be requested by the DAQ and elimination of reporting requirements.

The following table delineates all changes made to the permit.

PAGE	CONDITION	CHANGES
NA	Insignificant activities list	<p>The following sources were removed from the permit as categorically insignificant (i.e., not to be included in the Title V permit):</p> <ol style="list-style-type: none"> <li>1. natural gas-fired air make-up heater (6.42 million Btu per hour heat input, ID No. IES-2) [The heat input is 8.58 million Btu per hour heat input.];</li> <li>2. sixty nine infrared heaters (100,000 Btu/hr heat input each, ID Nos. ES-BMCO-IH1 through ES-BMCO-1H69)</li> <li>3. natural gas-fired air make up unit for Plant 2, Building 4 (0.375 million Btu per hour heat input, ID No. ES-BMCO-AMU7) [The correct source description is two units at 0.5 and 0.4 million Btu per hour heat input.];</li> <li>4. two natural gas-fired air make up units for Plant 2, Building 4 (0.45 million Btu per hour heat input each, ID Nos. ES-BMCO-AMU8 and ES-BMCO-AMU9) [the correct heat inputs are 1.25 and 0.4 million Btu per hour, respectively.];</li> <li>5. two natural gas-fired air make up unit for Plant 2, Building 4 (0.25 million Btu per hour maximum heat input each, ID No. ES-BMCO-AMU10 and 11); and</li> <li>6. natural gas-fired air make up unit for Plant 2, Building 4 (0.70 million Btu per hour heat input, ID No. ES-BMCO-AMU12) [The correct source description is two units at 0.7 million Btu per hour heat input each.].</li> </ol> <p>The following sources were removed from the permit at the request of the applicant because they no longer exist at the facility:</p> <ol style="list-style-type: none"> <li>1. two 500 gallon above ground storage tanks (ID Nos. IES-3 and IES-4); and</li> <li>2. natural gas-fired boiler (0.34 million Btu heat input; ID No. ES-BMCO-03).</li> </ol> <p>The description of the insignificant activity was modified (changes are in <b>bold font</b>):to include its location (natural gas-fired boiler <b>for Plant 2, Building 3</b> { 10.5 million Btu per hour heat input, ID No. ID No. IES-1}).</p>
3-4	Section 1 equipment list	<p>Four natural gas-fired plant make up air units (7.03 million Btu per hour heat input each; Plant 2 - Building 4; ES-BMCO-AMU1,ES-BMCO-AMU3, ES-BMCO-AMU4, ES-BMCO-AMU6) were removed from the permit as categorically insignificant (i.e., not to be included in the Title V permit).</p> <p>At the request of the Permittee, the following source ID No. designations and/or descriptions were changed (changes are in <b>bold font</b>):</p> <ol style="list-style-type: none"> <li>1. ID No. ES-SO, Sanding Operations: <b>Body and roof sheets, guard rails (Plant C2)</b>;</li> <li>2. ID No. ES4 - equipment cleaning operations: <b>gun cleaning/line purging</b> (Plant 2 - Building 2 and Building 3);</li> <li>3. ID No. ES-BMCO-01 now <b>ES-OV09</b>;</li> <li>4. ID No. ES-BMCO-02 now <b>ES-OV10</b>;</li> <li>5. ID No. ES-BMCO-B6 now <b>ES-BTH26</b>;</li> <li>6. ID No. ES-BMCO-B01, BO2, BO3 now <b>ES-BO1, ES-BO2, ES-BO3</b> and the description now Bonding operations; <b>windshields, doors, glass, floor covering, interior and exterior seams, body and roof sheets (Plant C2)</b>;</li> <li>7. ID No. ES-BMCO-C01, CO2, CO3 now <b>ES-CO1, ES-CO2, ES-CO3</b> and the description now Cleaning operations; <b>nap and miscellaneous solvent wipe down/line purging (Plant C2)</b>;</li> <li>8. ID No. ES2 - open processes (<b>Plant 9/Plant 2/Plant C2</b>); 9. ID No. ES6 - equipment cleaning operations; <b>gun cleaning/line purging</b> (Plant 9);</li> <li>10. ID No. ES-BMCO-B04 now <b>ES-BO4</b> and the description now Bonding operations; <b>roof and side sheets, headliners (Plant C2)</b>; and</li> <li>11. ID No. ES7 - part washing operations; <b>parts washers, maintenance</b> (Plants 2, <b>C2</b>, 9)</li> </ol>

PAGE	CONDITION	CHANGES
5	Section 2.1 A. Table	Added applicability to MACT for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart Mmmm). Added applicability to last MACT facility wide TAP assessment.
6	Section 2.1 A.1.d.	Semi annual reports to be postmarked by March 1 and July 30 (15A NCAC 2D .0515).
7	Section 2.1 A.3.e.	Semi annual reports to be postmarked by March 1 and July 30 (15A NCAC 2D .0521).
7	Section 2.1 A.5.d	Changed quarterly PSD avoidance condition reporting to semi annual. Reports to be postmarked by March 1 and July 30.
8	Section 2.1 A.6.c. Section 2.1 A.6.d.	Monitoring, recordkeeping and reporting was added to the Work Practice Standards for VOCs (15A NCAC 2D .0958).
8	Section 2.1 A.7.b Section 2.1 A.7.c.	Reporting of xylene emissions was eliminated and recordkeeping simplified.
9	Section 2.1 A.9.b.  Section 2.1 A.9.d.	Added expiration date for these requirements coinciding with compliance with the MACT standard Mmmm. Changed quarterly 112(g) avoidance condition reporting to semi annual. Reports to be postmarked by March 1 and July 30.
9	Section 2.1 A.10.	Compliance date and submittal requirements for MACT Mmmm were added.
9	Section 2.1 A.11.	Requirement for facility wide TAP assessment added to coincide with the last MACT compliance date submittal.
10-17	Section 3	General Conditions updated.
na	Part II	The Part II construction permit was removed along with all emission source notations of permit shield non applicability.

**5. Regulatory Review**

There are no new regulations that apply to this facility. The renewal will also serve as the second half of the 501(c)(2) construction permit/operating permit. The fee for the Title V application was waived as the changes are accomplished in the renewal.

**6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM**

This facility has no sources applicable to a NSPS.

Surface Coating of Miscellaneous Metal Parts and products (40 CFR 63, Subpart Mmmm) applies to this facility. The compliance date is January 2, 2007.

This facility has a PSD major source avoidance condition.

This facility is located in Guilford County, which is an early action compact non attainment area.

The Permittee has stated that they are not subject to 112r provisions for Prevention of Accidental Releases.

The only controls are for sanding operations, which have estimated uncontrolled emissions of 4.6 tons per year of PM. CAM does not apply.

**7. Facility Wide Toxic Air Pollutants**

Facility wide toxic air pollutants for formaldehyde, manganese (and manganese compounds), methyl ethyl ketone, and toluene are limited to the TPERs in 2D .0711.

Facility wide emissions of xylene are limited to 16.4 pounds per hour and 190.0 pounds per day with a 2D .1100 avoidance condition.

A facility wide assessment of toxic air pollutants will be required with the submission of the notification of compliance with the last applicable MACT (40 CFR 63, Subpart Mmmm), which is due March 28, 2008.

**8. Facility Compliance Status**

The facility is in compliance with all applicable regulations and permit conditions.

**9. Statement of Compliance**

The permit application contained a compliance certification Form E5 signed by Mr. Jeff Allen.

**10. Facility Emissions Review**

Facility emissions have not changed since the last permit review in March 2004.

**11. Stipulation Review**

Stipulations were modified as shown in the permit changes table.

**12. Conclusions, Comments, and Recommendations**

The RCO and WSRO recommend renewal of the Title V permit for another five year term.