Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

Review Report

Marathon Coach, Inc. **Permit No. 205161**
91333 Coburg Industrial Way
Coburg, OR 97408
Website: https://www.marathoncoach.com/

Source Information:

Primary SIC	3716 – Motor Homes
NAICS	336213 – Motor Home Manufacturing
Source	B.47: Motor coach

Categories (LRAPA title 37, Table 1)	manufacturing
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	N
Emission Credits	N
Compliance Schedule	N
Source Test [date(s)]	N

COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	2/15
Semi-Annual Report (due date)	N
GHG Report (due date)	N
Monthly Report (due date)	N

Quarterly Report (due date)	N
Excess Emissions Report	Y
Other Reports (due date)	N

Air Programs

NSPS (list subparts)	N
NESHAP (list subparts)	N
CAM	N
Regional Haze (RH)	N
TACT	N
40 CFR Part 68 Risk Management	N
Synthetic Minor (SM)	N
SM-80	N
Title V	N

Major FHAP Source	N
Federal Major Source	N
Type A State New Source Review	N
Type B State New Source Review	N
Prevention of Significant Deterioration (PSD)	N
Nonattainment New Source Review (NNSR)	N

Permittee Identification

1. Marathon Coach, Inc. ("the facility") operates a motor home manufacturing facility located at 91333 Coburg Industrial Way in Coburg, Oregon. This facility began operations in 1993.

General Background

2. Marathon Coach is a luxury bus conversion company. The facility operations include the conversion of bus shells into recreational vehicles and executive travelers. Conversion operations include painting and coating various components inside and outside the unit. Cabinetry, wood trim, countertops, flooring and upholstery are constructed within the unit to customer requirements.

Reasons for Permit Action and Fee Basis

3. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued on January 10, 2019 and expired on January 10, 2024. Because the actual emissions from calendar year 2023 were less than ten (10) tons/year for each criteria pollutant, the permit action is considered a Simple "low" ACDP renewal under LRAPA 37-0064(2)(a).

4. On December 11, 2023, the facility submitted an application for a Type 2 change under subsection 34-035(2) to modify the existing Simple ACDP to include the requirements of 40 CFR part 63 subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. As part of a review of the coating materials used by the facility in preparation for this renewal, the facility determined that at least one of their coatings contained target metals regulated by this NESHAP. This change requires a modification of the existing Simple ACDP and is considered a Non-PSD/NSR Simple Technical Permit Modification under section 37-8020, Table 2, Part 4. Specific Activity Fees.

Attainment Status

5. The facility is located in an area that has been designated as attainment or unclassified for all criteria pollutants. The facility is outside the Eugene-Springfield UGB as defined in LRAPA 29-0010 which designates the Eugene-Springfield CO and PM_{10} maintenance areas. The facility is also located outside the Eugene-Springfield UGB as described in the current Eugene-Springfield Metropolitan Area General Plan, as amended.

Permitting History

6. LRAPA has reviewed and issued the following permitting actions to this facility:

Date(s) Approved/Valid	Permit Action Type	Description
10/14/1996 – 10/13/2001	Synthetic Minor (SM) ACDP	Initial air permit.
10/14/2001 – 10/13/2006	SM ACDP	Renewal.
09/13/2004	NC-205161-A04	Construction of fourth spray booth.
12/12/2005	Addendum No. 1	Changed permitted sources from 3 spray booths to 4 spray booths.
12/14/2009 – 10/12/2011	Simple ACDP	Convert SM ACDP to Simple ACDP
02/18/2010	Addendum No. 1	Consolidation of composites manufacturing from the Cresswell operation (205172) with the Coburg operation (205161).
04/23/2013 – 04/23/2018	Simple ACDP	Renewal.
01/10/2019 – 01/10/2024	Simple ACDP	Renewal.

Date(s) Approved/Valid	Permit Action Type	Description
05/29/2024	NC-205161-A23	Modification of spray booths SB-1 through SB-4 which triggers applicability of 40 CFR part 63 subpart 6H
05/29/2024 – 05/29/2034	Simple ACDP	Renewal.

Compliance History

7. This facility is regularly inspected by LRAPA. The following table indicates the Full Compliance Evaluation inspection history of this facility.

Agency	Type of Inspection	Date	Results
LRAPA	Full Compliance Evaluation	09/22/1998	Not in compliance
LRAPA	Full Compliance Evaluation	09/24/1999	No evidence of non-compliance
LRAPA	Full Compliance Evaluation	08/25/2000	On schedule
LRAPA	Full Compliance Evaluation	07/17/2001	On schedule
LRAPA	Full Compliance Evaluation	07/23/2002	On schedule
LRAPA	Full Compliance Evaluation	09/30/2002	On schedule
LRAPA	Full Compliance Evaluation	09/22/2006	No evidence of non-compliance
LRAPA	Full Compliance Evaluation	01/22/2013	On schedule
LRAPA	Full Compliance Evaluation	11/08/2023	On schedule

8. LRAPA has issued the following violation notices and/or taken the following enforcement actions against this facility:
   - 8.a. An ADCP was issued on October 13, 2006 and was originally scheduled to expire on October 12, 2011. The facility was required to have submitted the renewal application 60 days prior to expiration, but submitted a late renewal application on December 14, 2012. Because the facility submitted annual reports and fees as required, LRAPA chose to not pursue formal enforcement action for the untimely renewal application submittal.
   - 8.b. On November 24, 2008 the facility was issued Notice of Non-Compliance (NON) No. 1736 for: exceeding annual emission limit for VOC, failing to submit quarterly reports, and failure to maintain records of dust collector inspection and repair. The facility was required to submit a permit modification application within 30 days, submit semi-annual emission reports retroactive to June 1998, and immediately begin maintaining records of dust collector inspection and repair. The facility submitted the permit modification application and fees and the file was closed.

Source Testing

9. The facility is not required to conduct source testing at this time. LRAPA is not aware of any historical source testing conducted at this facility.

Emission Unit Description

10. The emission units regulated by this permit are the following:

Emission Unit ID	Description	Pollution Control Device (PCD ID)	Installed / Last Modified
PR	Production and Installation Area	Uncontrolled	1993
CS	Cabinet Shop	Two (2) baghouses	1993
SB-1	Spray Booth #1	Dry Filters	1993
SB-2	Spray Booth #2	Dry Filters	1993
SB-3	Spray Booth #3	Dry Filters	2001

SB-4	Spray Booth #4	Dry Filters	2005
MAU-1	Natural-Gas Fired Make-up Air Unit for SB-1	Uncontrolled	1993
MAU-2	Natural-Gas Fired Make-up Air Unit for SB-2	Uncontrolled	1993
MAU-3	Natural-Gas Fired Make-up Air Unit for SB-3	Uncontrolled	2001
MAU-4	Natural-Gas Fired Make-up Air Unit for SB-4	Uncontrolled	2005
MS	Metal Shop	Uncontrolled	1993
WS	Wood Shop	One (1) baghouse	1993
SS	Solid Surface	One (1) baghouse	1993
FG	Fiberglass Operation Including Spray Booth	Dry Filters	2010

11. The previous permit included a process known as SC – Service Center as a significant emission unit. This process was reviewed by LRAPA during the most recent inspection and determined to not be a categorically insignificant activity under LRAPA title 12. Consequently, this process has been removed from the permit.

Significant Emission Units

12. Emission Unit PR
PR represents the production and installation area where the coach chassis is parked for conversion. Miscellaneous activities that produce VOCs and particulate matter occur in this area. Distinct emission units include a small paint booth using spray cans only for miscellaneous parts and a work area with fan exhaust for bondo sanding and gluing activities. The VOC emissions from this area are accounted for in the facility-wide VOC tracking. Due to the insignificant nature of the particulate matter emissions from this process, no particulate matter emission estimates have been calculated. The facility also has exhaust pickups for capturing combustion emissions when operating coach generators or engines, but these sources are considered nonroad engines and mobile sources and do not count toward facility emissions. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

13. Emission Unit SB-1
Emission Unit SB-2
Emission Unit SB-3
Emission Unit SB-4
The facility operates four spray booths for applying primers and coatings to coach bodies. The particulate matter from paint overspray is controlled by dry filters. The dry filters achieve at least 98% capture of overspray particulate matter emissions. Because the coach surfaces being primed or painted consist of long flat panels, the average transfer efficiency of overspray solids from the spray painting process is assumed to be approximately 80%. Potential emissions from this process are based on an estimated maximum of 30 coach conversions per calendar year. The VOC emissions from these processes are accounted for in the facility-wide VOC tracking. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

14. Emission Unit MAU-1
Emission Unit MAU-2
Emission Unit MAU-3
Emission Unit MAU-4
Each spray booth SB-1 through SB-4 has one (1) make-up air unit with a maximum heat input rating of 2.0 MMBtu per hour. The criteria pollutant and GHG emissions from these emission units are based on emission factors derived from DEQ AQ-EF05 – Emission Factors Gas Fired Boilers and US EPA 40 CFR part 98, Tables C-1 and C-2. The federal HAP or CAO TAC emissions from these emission units are based on emission factors from DEQ's 2020 Air Toxics Emission Inventory Combustion Emission Factor Tool. Potential emissions are based on 8,760 hours per

year of operation. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

15. Emission Unit MS
The facility has a very small metal shop that does an insignificant amount of brazing. There is a hood over the brazing area for work exposure issues. A general roof vent is present in the room. Due to the insignificant nature of the activities in the metal shop, no emission estimates have been calculated for this process. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

16. Emission Unit CS
Emission Unit WS
Emission Unit SS
The facility has a number of areas that cut wood or solid surface materials to create interior or exterior surfaces. The cabinet shop (CS) and wood shop (WS) contain various machines, including routers, laminators, table saws, band saws, chop saws and CNC machines. The particulate matter emissions from Emission Unit CS are controlled by two (2) baghouses. The particulate matter emissions from Emission Unit WS are controlled by one (1) baghouse. The particulate matter emissions from Emission Units SS are controlled by one (1) baghouse. Each baghouse is assumed to have a particulate matter control efficiency of at least 99.9%. Potential emissions from these processes were back-calculated from actual amounts of material disposed from each baghouse and an estimated maximum of 30 coach conversions per calendar year. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

17. Emission Unit FG
The facility conducts some fiberglass operations. There is a small booth for spraying gel coat. The particulate matter emissions from overspray are controlled by dry filters that achieve at least 98% capture of overspray particulate matter emissions. The VOC emissions from this process are calculated using the emission factors determined from Table 1 to 40 CFR part 63 subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Potential emissions from this process are based on an estimated maximum of 30 coach conversions per calendar year. The particulate matter emissions from the facility were determined to be de minimis on a potential emission basis.

Nuisance, Deposition and Other Emission Limitations

18. Under LRAPA 49-010(1), the permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of the receipt of these complaints.

19. Under LRAPA 32-055, the permittee must not cause or permit the emission of particulate matter which is larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of the receipt of these complaints.

20. Under LRAPA 32-090(1), the permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination is to be made by LRAPA. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of the receipt of these complaints.

Emission Limitations

21. The facility is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. Compliance is demonstrated through a plant survey of visible emissions using EPA Method 22 to be completed at least once a quarter. The permittee is required to take corrective action if any visible emissions are identified and contact LRAPA or conduct an EPA Method 9 test if the visible emissions cannot be eliminated. In addition, the permittee must prepare and maintain an Operation & Maintenance Plan for all particulate matter emission control devices at the facility.

22. The non-fuel burning equipment at this source that emits particulate matter is subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot. Compliance is demonstrated through a plant survey of visible emissions using EPA Method 22 to be completed at least once a quarter. The permittee is required to take corrective action if any visible emissions are identified, contact LRAPA or conduct an EPA Method 9 test if the visible emissions cannot be eliminated. In addition, the permittee must prepare and maintain an Operation & Maintenance Plan for all particulate matter emission control devices at the facility.

23. Each emission unit at the facility is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance will be demonstrated through the preparation and maintenance of an Operation & Maintenance Plan for all particulate matter emission control devices at the facility.

24. The control equipment and spray booth operations at the facility must be operated and maintained at the highest and best practicable treatment and control of air contaminant emissions so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels under LRAPA 32-005(1). Compliance for the control equipment at the facility will be demonstrated through the implementation of an Operation & Maintenance Plan. For the gel coating operations, the permittee will be required to use dry filters achieving at least 98% capture of overspray particulate matter emissions. For the spray booth operations, the facility will be required to meet the requirements of 40 CFR 63 subpart HHHHHH (6H) – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Typically Achievable Control Technology (TACT)

25. LRAPA 32-008(1) requires an existing unit at a facility prior to January 1, 1994, meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emissions do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare, or the environment.

25.a. The following emission units are not subject to TACT because they do not have emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant: PR, CS, SB-1, SB-2, MAU-1, MAU-2, MS, WS, SC, and SS.

26. LRAPA 32-008(2) requires new units installed or existing emission units modified on or after January 1, 1994, meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR in title 38, Type A State NSR in LRAPA title 38, an applicable Standard of Performance for New Stationary Sources in title 46, or any other standard applicable only to new or modified sources in title 32, title 33, or title 39 for the regulated pollutant emitted; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.

26.a. The following emission units are not subject to TACT because they do not have emissions of criteria pollutants equal to or greater than one (1) ton per year: MAU-3, MAU-4, and FG.

26.b. The following emission units are subject to TACT because they have emissions of criteria pollutants equal to or greater than one (1) ton per year: SB-3 and SB-4. While LRAPA has not performed a formal TACT determination for VOCs from this emission unit, LRAPA has determined that the following requirements likely meet TACT: Compliance with the requirements of 40 CFR 63 subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Plant Site Emission Limits (PSELs)

27. Provided below is a summary of the baseline emissions rate, netting basis, and PSELs for this facility.

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PSEL Increase Over Netting Basis (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
PM	NA	0	0	24	de minimis	NA	25
PM_{10}	NA	0	0	14	de minimis	NA	15
$PM_{2.5}$	NA	0	0	9	de minimis	NA	10
CO	NA	0	0	99	2.9	NA	100
NO_X	NA	0	0	39	3.4	NA	40
SO_2	NA	0	0	de minimis	de minimis	NA	40
VOC	NA	0	0	39	15	NA	40
GHG	NA	0	0	74,000	4,103	NA	75,000
Individual HAP	NA	NA	NA	9	NA	NA	NA
Aggregate HAPs	NA	NA	NA	24	NA	NA	NA

27.a. The facility does not have a baseline emission rate for pollutants other than $PM_{2.5}$ and GHGs because the facility was not in operation during either the 1977 or 1978 baseline year. A baseline emission rate is not established for $PM_{2.5}$ in accordance with LRAPA 42-

0048(3). The facility has no baseline for GHGs because the facility did not request a baseline for this pollutant.

27.b. The netting basis for all pollutants is 0 (zero) in accordance with LRAPA 42-0046(4) and 42-0040(2)&(3).

27.c. In accordance with LRAPA 42-0041(2), the PSELs are set equal to the sources potential-to-emit (PTE) for a given regulated pollutant. The previous PSEL for this facility were set at the Generic PSEL as allowed under previous regulations that have been revised. No PSELs are set for PM, PM_{10}, $PM_{2.5}$, and SO_2 in accordance with LRAPA 42-0020(3)(a) because these pollutants are emitted below the de minimis as defined in LRAPA title 12.

27.d. The baseline year, netting basis, and SER are not applicable for limiting federal HAPs. The PSELs for individual federal HAPs and aggregate federal HAPs of 9 TPY and 24 TPY, respectively, have been removed from the permit. The facility does not have a potential-to-emit for federal HAPs that will exceed the major source thresholds for individual federal HAPs and aggregate federal HAPs of 10 TPY and 25 TPY, respectively.

Unassigned Emissions and Emission Reduction Credits

28. The facility has zero (0) unassigned emissions. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

29. This source is located in an area that is designated attainment or unclassified for all regulated pollutants. The proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR.

Federal Hazardous Air Pollutants/Toxic Air Contaminants

30. The facility currently has PSELs for federal HAPs that limit emissions to no more than nine (9) tons per year for an individual federal HAP and 24 tons per year for the aggregate of all federal HAPs. The capacity of federal HAPs from the facility is below these thresholds and these emission limits will be removed. Therefore, the facility is considered a natural minor or area source of federal HAPs. The maximum potential emission of a single federal HAP is 3.86 tons per year (toluene). The potential aggregate of all federal HAP emissions is 9.39 tons per year.

31. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is, therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in the rule. All federal HAPs are on the list of approximately 600 toxic air contaminants. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

32. Provided below is a summary of the federal HAP and CAO TAC potential emission estimates based primarily on a ratio of the 2023 actual production of 17 coaches to the predicted maximum coach production of 30 coaches. See the Emission Detail Sheets section of this Review Report for more information.

Pollutant	CAS/DEQ Number	Potential Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics				
Acetaldehyde	75-07-0	1.5E-04	Yes	Yes
Acrolein	107-02-8	9.2E-05	Yes	Yes
Benzene	71-43-2	2.7E-04	Yes	Yes
Benzo[a]pyrene	50-32-8	4.1E-08	Yes	Yes
Ethyl Benzene	100-41-4	1.9E-03	Yes	Yes
Formaldehyde	50-00-0	5.8E-04	Yes	Yes
Glycol Ethers	--	1.1E-02	Yes	Yes
Hexane	110-54-3	2.04	Yes	Yes
Methanol	67-56-1	0.96	Yes	Yes
Methyl Ethyl Ketone	78-93-3	1.6E-03	No	Yes
Methyl Isobutyl Ketone	108-10-1	1.16	Yes	Yes
Methyl Methacrylate	80-62-6	7.8E-02	Yes	Yes
Naphthalene	91-20-3	1.0E-05	Yes	Yes
POM (inc. PAHs)	401	3.4E-06	Yes	Yes
Styrene	100-42-5	0.38	Yes	Yes
Toluene	108-88-3	3.86	Yes	Yes
Xylenes	1330-20-7	0.90	Yes	Yes
Inorganic Gases				
Ammonia	7664-41-7	0.11	No	Yes
Metals				
Arsenic and compounds	7440-38-2	6.8E-06	Yes	Yes
Barium and compounds	7440-39-3	1.5E-04	No	Yes
Beryllium and compounds	7440-41-7	4.1E-07	Yes	Yes
Cadmium and compounds	7440-43-9	3.8E-05	Yes	Yes
Chromium (VI)	18540-29-9	4.8E-05	Yes	Yes
Cobalt and compounds	7440-48-4	2.9E-06	Yes	Yes
Copper and compounds	7440-50-8	2.9E-05	No	Yes
Lead and compounds	7439-92-1	1.7E-05	Yes	Yes
Manganese and compounds	7439-96-5	1.3E-05	Yes	Yes
Mercury and compounds	7440-50-8	8.9E-06	Yes	Yes
Molybdenum Trioxide	1313-27-5	5.6E-05	No	Yes
Nickel compounds, insoluble	7440-02-0	7.2E-05	Yes	Yes
Selenium and compounds	7782-49-2	8.2E-07	Yes	Yes
Vanadium (fume or dust)	7440-62-2	7.9E-05	No	Yes
Zinc and compounds	7440-66-6	9.9E-04	No	Yes

Toxics Release Inventory

33. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI program. In general, chemicals covered by the TRI program are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

In 2022, this facility did not report any emissions to the TRI program. In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. This facility has not reported any emissions to the TRI program because they apparently do not manufacture, process, or otherwise use chemicals in excess of the applicable reporting thresholds.

New Source Performance Standards (NSPSs)

34. There are no emission units at this facility for which NSPS have been promulgated or are applicable.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

35. LRAPA reviewed the following NESHAPs to determine their applicability to this facility:
    - 35.a. 40 CFR part 63 subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations is not applicable because the facility is not a major source of federal HAPs.
    - 35.b. 40 CFR part 63 subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable because the facility is not a major source of federal HAPs.
    - 35.c. 40 CFR part 63 subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating Plastic Parts and Products is not applicable because the facility is not a major source of federal HAPs.
    - 35.d. 40 CFR part 63 subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production is not applicable because the facility is not a major source of federal HAPs.

36. The spray coating operations at this facility are subject to 40 CFR part 63 subpart HHHHHH (6H) – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because at least one (1) raw material that may be used in the spray coating process contains a target HAP covered by this regulation. The target HAPs covered by this regulation include cadmium, chromium, manganese, nickel, or lead. The 40 CFR part 63 subpart 6H requirements that are applicable to this facility are identified in the following table:

40 CFR part 63 subpart 6H Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11169	Purpose	Yes	--	--
63.11170	Applicability	Yes	--	--
63.11171	New or existing source determination	Yes	--	--
63.11172	Compliance deadlines	Yes	--	--

40 CFR part 63 subpart 6H Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11173	General requirements for complying	Yes	--	17
63.11174	General Provisions applicability	Yes	--	18
63.11175	Notifications	Yes	--	19
63.11176	Reports	Yes	--	20
63.11177	Records	Yes	--	21
63.11178	Record retention requirements	Yes	--	22
63.11179	Implementation and enforcement	Yes	--	--
63.11180	Definitions	Yes	--	--

Recordkeeping Requirements

37. The facility is required to keep and maintain a record of the following information for a period of at least five (5) years.

Activity	Parameter	Units	Minimum Recording Frequency
PSEL Recordkeeping			
VOC-containing material CPDS or SDS	Each VOC-containing material	NA	Maintain documentation
VOC-containing material Usage	Material name and usage	Gallons	Monthly
VOC-containing material Usage	Density of material	Pounds per gallon	Each coating and solvent
VOC-containing material usage	VOC content	% by weight	Each coating and solvent
Spray booth filter particulate matter control efficiency	Control efficiency	%	Maintain documentation from each filter manufacturer
Spray booth filter replacement	Occurrence	NA	Upon Replacement
Facility-wide natural gas usage	NA	Therms or MMcf	Monthly
40 CFR part 63 subpart HHHHHH Recordkeeping			
All records required by 40 CFR part 63 subpart HHHHHH under Condition 21 of the permit	NA	NA	As required
General Recordkeeping			
Log of nuisance complaints	NA	NA	Upon receipt of complaint

Activity	Parameter	Units	Minimum Recording Frequency
Visible Emission Survey	Opacity	%	Quarterly
Operation and Maintenance Plan	NA	NA	Maintain the current version on-site
Upset Log of all planned and unplanned excess emissions, as required by Condition G16 of the permit	NA	NA	Per occurrence

Reporting Requirements

38. The facility must submit to LRAPA the following reports by no later than the dates indicated in the table below:

Report	Reporting Period	Due Date
PSEL pollutant emissions as calculated according to Conditions 5 and 7 of the permit, including the supporting process information.	Annual	February 15
All reports required by 40 CFR part 63 subpart HHHHHH under Condition 20 of the permit.	Annual	February 15
A summary of maintenance and repairs performed on any pollution control devices at the facility.	Annual	February 15
A summary of all complaints received by the permittee and their resolution as required by Condition G11 of the permit.	Annual	February 15
The upset log information required by Condition G14 of the permit, if any planned or unplanned excess emissions have occurred during the reporting period.	Annual	February 15

39. The permittee is not subject to greenhouse gas reporting under OAR 340 Division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO_2 equivalents per year. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

Public Notice

40. Pursuant to OAR 340-216-0065(5)(a), which became effective on March 1, 2023, issuance of a renewed Simple Air Contaminant Discharge Permit requires public notice in accordance with OAR 340-209-0030(3)(c) [aka LRAPA 31-0030(3)(c)], which requires LRAPA to provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.

    The proposed permit was on public notice from April 17, 2024 to May 23, 2024. No written comments were submitted during the public comment period. No public hearing was requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals.

JJW/AA
05/29/2024

Emission Details

Marathon Coach
Emission Detail Sheets
Facility Potential Emissions Summary

Criteria Pollutant Emissions

	PM (TPY)	PM_{10} (TPY)	$PM_{2.5}$ (TPY)	NO_x (TPY)	CO (TPY)	SO_2 (TPY)	VOC (TPY)	GHGs (TPY)
PTE	0.11	0.11	0.11	3.42	2.87	0.06	15.24	4,103
PSEL	de minimis	de minimis	de minimis	3.4	2.9	de minimis	15	4,103
CIA								

FHAP/TAC Emissions

Pollutant	CAS/DEQ Number	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics				
Acetaldehyde	75-07-0	1.5E-04	Yes	Yes
Acrolein	107-02-8	9.2E-05	Yes	Yes
Benzene	71-43-2	2.7E-04	Yes	Yes
Benzo[a]pyrene	50-32-8	4.1E-08	Yes	Yes
Ethyl Benzene	100-41-4	1.9E-03	Yes	Yes
Formaldehyde	50-00-0	5.8E-04	Yes	Yes
Glycol Ethers	--	1.1E-02	Yes	Yes
Hexane	110-54-3	2.04	Yes	Yes
Methanol	67-56-1	0.96	Yes	Yes
Methyl Ethyl Ketone	78-93-3	1.6E-03	No	Yes
Methyl Isobutyl Ketone	108-10-1	1.16	Yes	Yes
Methyl Methacrylate	80-62-6	7.8E-02	Yes	Yes
Naphthalene	91-20-3	1.0E-05	Yes	Yes
POM (inc. PAHs)	401	3.4E-06	Yes	Yes
Styrene	100-42-5	0.38	Yes	Yes
Toluene	108-88-3	3.86	Yes	Yes
Xylenes	1330-20-7	0.90	Yes	Yes
Inorganic Gases				
Ammonia	7664-41-7	0.11	No	Yes
Metals				
Arsenic and compounds	7440-38-2	6.8E-06	Yes	Yes
Barium and compounds	7440-39-3	1.5E-04	No	Yes
Beryllium and compounds	7440-41-7	4.1E-07	Yes	Yes
Cadmium and compounds	7440-43-9	3.8E-05	Yes	Yes
Chromium (VI)	18540-29-9	4.8E-05	Yes	Yes
Cobalt and compounds	7440-48-4	2.9E-06	Yes	Yes
Copper and compounds	7440-50-8	2.9E-05	No	Yes
Lead and compounds	7439-92-1	1.7E-05	Yes	Yes
Manganese and compounds	7439-96-5	1.3E-05	Yes	Yes
Mercury and compounds	7440-50-8	8.9E-06	Yes	Yes
Molybdenum Trioxide	1313-27-5	5.6E-05	No	Yes
Nickel compounds, insoluble	7440-02-0	7.2E-05	Yes	Yes
Selenium and compounds	7782-49-2	8.2E-07	Yes	Yes
Vanadium (fume or dust)	7440-62-2	7.9E-05	No	Yes
Zinc and compounds	7440-66-6	9.9E-04	No	Yes
Total Emissions (TPY) =		9.50	9.39	9.50
Max Individual FHAP (TPY) =			3.86	

Notes:

Marathon Coach
Emission Detail Sheets
VOC Emissions

80%	**= Minimum Coating Transfer Efficiency**
98%	**= Minimum Filter PM Removal Efficiency**
17	**= 2023 Coach Production**
30	**= Maximum Coach Production**
1.8	**= Scale Up Factor**

	Total	VOC		Particulate Matter		Toluene		MEK		Xylene		Ethylbenzene		Glycol Ethers		Methanol		MIBK		Hexane		Styrene		MMA		Total
Product	**Pounds**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**HAP's**
PAINT																										
DB-Bases	5.6	91%	5.1	9.3%	2.1E-03	10%	0.6		0.0	10%	0.6	5%	0.3		0.0		0.0	15%	0.8		0.0		0.0		0.0	2.2
CB--Base Coats	41.8	44%	18.3	56.3%	9.4E-02		0.0		0.0		0.0		0.0	25%	10.5		0.0		0.0		0.0		0.0		0.0	10.5
BC--Base Coats	2,618.7	100%	2,618.7	0.0%	0.0E+00		0.0		0.0	20%	523.7	5%	130.9		0.0		0.0	50%	1,309.4		0.0		0.0		0.0	1,964.1
D403 Black	326.4	75%	243.3	25.4%	3.3E-01		0.0		0.0	15%	49.0	3%	9.8		0.0		0.0		0.0		0.0		0.0		0.0	
D121A	3.9	52%	2.0	47.7%	7.4E-03		0.0		0.0	10%	0.4	3%	0.1		0.0		0.0		0.0		0.0		0.0		0.0	
SCB-Bases	4.0	52%	2.1	47.7%	7.5E-03		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
SC90	21.5	50%	10.7	50.0%	4.3E-02		0.0		0.0	3%	0.6	1%	0.2		0.0		0.0		0.0		0.0		0.0		0.0	
SC403	69.4	0%	0.0	100.0%	2.8E-01		0.0		0.0	3%	2.1	1%	0.7		0.0		0.0		0.0		0.0		0.0		0.0	
CLEARS/HARDENERS																										
DH42	60.0	30%	18.1	69.8%	1.7E-01	15%	9.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	9.0
DH44	43.6	35%	15.3	64.8%	1.1E-01	5%	2.2																			
DH46	822.7	50%	413.0	49.8%	1.6E+00		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
DH47	32.0	50%	16.1	49.8%	6.4E-02		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
DC92	2,277.2	67%	1,525.7	33.0%	3.0E+00	1%	22.8		0.0	5%	113.9	3%	68.3		0.0		0.0		0.0		0.0		0.0		0.0	204.9
355-55	59.8	82%	49.0	18.0%	4.3E-02	20%	12.0		0.0						0.0		0.0		0.0		0.0		0.0		0.0	
BC045	13.1	62%	8.1	38.0%	2.0E-02		0.0		0.0	30%	3.9	1%	0.1		0.0		0.0		0.0		0.0		0.0		0.0	4.1
BC100	174.0	52%	90.7	47.9%	3.3E-01		0.0		0.0	15%	26.1	3%	5.2		0.0		0.0		0.0		0.0		0.0		0.0	31.3
BC101	104.2	52%	54.3	47.9%	2.0E-01		0.0		0.0	15%	15.6	3%	3.1		0.0		0.0		0.0		0.0		0.0		0.0	18.8
BC00	88.7	47%	41.3	53.4%	1.9E-01		0.0		0.0	3%	2.7	1%	0.9		0.0		0.0		0.0		0.0		0.0		0.0	3.5
DT-5 Virgin Lacquer	1,181.3	89%	1,051.3	11.0%	5.2E-01	50%	590.6		0.0		0.0		0.0		0.0	50%	590.6		0.0		0.0		0.0		0.0	1,181.3
RMH55	40.1	36%	14.3	64.4%	1.0E-01		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
RMH57	19.0	36%	6.8	64.4%	4.9E-02		0.0		0.0		0.0		0.0		0.0		0.0		0.0	20%	3.8		0.0		0.0	3.8
UV 1K Clear	4.2	0%	0.0	100.0%	1.7E-02		0.0		0.0		0.0		0.0		0.0		0.0		0.0	2%	0.1		0.0		0.0	0.1
965-60	14.4	36%	5.1	64.4%	3.7E-02		0.0		0.0	50%	7.2	5%	0.7		0.0		0.0		0.0		0.0		0.0		0.0	7.9
PRIMERS																										
DE17	55.0	41%	22.3	59.4%	1.3E-01		0.0	0%	0.0	25%	13.8	10%	5.5		0.0		0.0		0.0		0.0		0.0		0.0	19.3
DA17	40.7	41%	16.5	59.4%	9.7E-02		0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
DP20	255.6	13%	34.3	86.6%	8.9E-01		0.0		0.0	10%	25.6	3%	7.7		0.0		0.0		0.0		0.0		0.0		0.0	33.2
DP31	177.8	83%	147.2	17.2%	1.2E-01		0.0		0.0	5%	8.9	3%	5.3		0.0		0.0		0.0		0.0		0.0		0.0	14.2
EP769	23.2	83%	19.2	17.2%	1.6E-02		0.0		0.0	15%	3.5	5%	1.2		0.0		0.0		0.0		0.0		0.0		0.0	4.6
801-72	72.2	35%	25.3	65.0%	1.9E-01		0.0		0.0	15%	10.8	3%	2.2	3%	2.2		0.0		0.0		0.0		0.0		0.0	15.2
151-170A	1.9	10%	0.2	90.0%	7.0E-03		0.0	5%	0.1		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.1
PH12	44.3	72%	32.0	27.8%	4.9E-02	20%	8.9		0.0		0.0		0.0		0.0		0.0		0.0	50%	22.1		0.0		0.0	31.0
UP0741V	49.0	83%	40.8	16.7%	3.3E-02		0.0		0.0		0.0	5%	2.4		0.0		0.0		0.0		0.0		0.0		0.0	2.4
868	1.8	56%	1.0	44.1%	3.2E-03		0.0		0.0	75%	1.4	15%	0.3		0.0		0.0		0.0		0.0		0.0		0.0	1.6
709	181.4	40%	72.6	60.0%	4.4E-01		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	30%	54.4		0.0	54.4
IFTRUE201682	455.6	50%	227.8	50.0%	9.1E-01		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	10%	45.6	45.6
PA897	7.5	0%	0.0	100.0%	3.0E-02		0.0		0.0	50%	3.7	15%	1.1		0.0		0.0		0.0		0.0		0.0		0.0	4.8
REDUCERS																										
R-256	97.6	16%	15.9	83.7%	3.3E-01		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
LMI	7.3	7%	0.5	93.0%	2.7E-02		0.0		0.0	100%	7.3		0.0		0.0		0.0		0.0		0.0		0.0		0.0	7.3
UR 40	51.8	83%	43.0	17.0%	3.5E-02	20%	10.4		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	10.4
UR 50	801.9	95%	763.4	4.8%	1.5E-01		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
BR 50	803.0	65%	522.0	35.0%	1.1E+00	25%	200.8		0.0	20%	160.6	5%	40.2		0.0		0.0		0.0		0.0		0.0		0.0	401.5
UR 60	414.2	100%	414.2	0.0%	0.0E+00		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
DEGREASERS/MISC																										
203 Limco	158.3	13%	20.9				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
360-4 Metal Prep	18.7	57%	10.6				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
D111	417.0	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
D160	38.8	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
SL26 Denatured Alcohol	412.3	**100%**	412.3				0.0		0.0		0.0		0.0		0.0	60%	247.4	1%	4.1		0.0		0.0		0.0	251.5
AC18 Acetone	59.1	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
870A	2.7	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
875	127.6	37%	46.8				0.0		0.0	3%	3.8	1%	1.3		0.0		0.0		0.0		0.0		0.0		0.0	5.1
876	204.7	36%	73.4				0.0		0.0	3%	6.1	1%	2.0		0.0		0.0		0.0		0.0		0.0		0.0	8.2
Jet95	14.3	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
76394 Citrus Cleaner	43.2	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
8984	22.0	100%	22.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
SW50 Glass Cleaner	995.6	**25%**	248.9				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
21210 Super 77	9.1	75%	6.8				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
IMP2102	49.9	18%	9.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	30%	15.0		0.0	15.0
D108	226.7	3%	5.7				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
63465	78.5	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
ADHESIVES																										
Spray Adhesive-Krylon	119.2	78%	92.4				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
DAP Landau 235	7,623.0	62%	4,726.3			30%	2,286.9		0.0		0.0		0.0		0.0		0.0		0.0	30%	2,286.9		0.0		0.0	4573.8
Adhesive Spray 581	285.6	55%	157.1				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	15%	42.8		0.0	42.8
Wood Glue--Titebond	323.3	54%	174.9				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
PAINT/LACQUERS																										
Primer-White	40.1	45%	17.9			8%	3.2	4%	1.8		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	5.0
KRYLON--Heat	925.0	47%	434.8			50%	462.5		0.0	3%	27.8	1%	0.0		0.0		0.0		0.0		0.0		0.0		0.0	490.3
KRYLON	4.8	83%	3.9			25%	1.2		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	1.2
SOLVENTS/CLEANERS																										
Denatured Alcohol	412.3	100%	412.3			0%	0.0		0.0		0.0		0.0		0.0	60%	247.4		0.0		0.0		0.0		0.0	247.4
Toluene	718.9	100%	718.9			100%	718.9		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	718.9
Acetone	85.4	0%	0.0				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
SW50 Glass Cleaner	966.7	10%	96.4				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
MISCELLANEOUS																										
Rubberized UnderCoat	196.6	38%	74.2			20%	39.3		0.0	1%	0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	39.3
Silicone Spray	13.7	100%	13.7				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0
Temp-Coat	682.5	45%	308.9				0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	0.0

	Coatings	VOC's	PM	Toluene	MEK	Xylene	Ethelbenzene	Glycol Ethers	Methanol	MIBK	Hexane	Styrene	MMA	Total HAPs
2023 Total Pounds =	26,837.4	16,690.3	11.8	4,368.6	1.9	1,018.4	289.3	12.6	1,085.4	1,313.5	2,312.9	112.2	45.6	10,483.3
2023 Total Tons =	13.4	8.3	5.9E-03	2.2	9.3E-04	0.5	0.1	6.3E-03	0.5	0.7	1.2	5.6E-02	2.3E-02	5.2
PTE Total Tons =	23.7	14.7	1.0E-02	3.9	1.6E-03	0.9	0.3	1.1E-02	1.0	1.2	2.0	0.1	4.0E-02	9.2

Notes:
Particulate matter emissions are from overspray resulting from spray coatings.

Marathon Coach
Emission Detail Sheets
Fiberglass (FG)

65%	**= Minimum Coating Transfer Efficiency**
98%	**= Minimum Filter PM Removal Efficiency**
17	**= 2023 Coach Production**
30	**= Maximum Coach Production**
1.8	**= Scale Up Factor**

				VOC		Emission	Adjusted	Particulate Matter		Ethylbenzene		MMA		Styrene		Total
Product	**Total gal**	**Density (lbs/gal)**	**Total lbs**	**%**	**lbs**	**Factor lbs/ton**	**VOC lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**%**	**lbs**	**HAP's lbs**
MA300 Plexus 400ML Case (12ea)	8.89	8.1	72.0	60%	43.2		43.2					60%	43.2			43.2
Acetone 55Gal	275	6.572	1,807	0.1%	1.8		1.8			0.1%	1.8					1.8
712-3765/8245 ORTHO RESIN 474#/DX 55Gal	165	9.1	1,502	43%	645.6	140.2	105.2							43	105.2	105.2
6631-20 PRE-PROMOTED ISO RESIN 55Gal	165	9.43	1,556	50%	778.0	180.2	140.2							60	140.2	140.2
969-AA-636 PRIMER GRAY MC SANDING 5Gal	40	11.91	476.4	24%	114.3	213.6	50.9	76.0%	2.5					24	50.9	50.9
Poly-Fair F26R Putty 5gal	10	5.925	59.3	36%	21.3		21.3							36	21.3	21.3
MEKP-925 FRED MEKP Gal	2	9.18	18.4	14%	2.6		2.6									
MEKP-925 Clear MEKP Gal	3	9.18	27.5	5%	1.4		1.4									
				2023 Total Emissions (TPY) =			0.18		1.3E-03		9.0E-04		2.2E-02		0.16	0.18
				Potential Total Emissions (TPY) =			0.32		2.2E-03		1.6E-03		3.8E-02		0.28	0.32

Notes:
969-AA-636 Primer Gray MC Sanding is used for gel coat application.
Manual resin application VOC emissions based on Table 1 to 40 CFR 63 subpart WWWW, Item 1.a. - manual resin application, nonvapor-suppressed resin for materials with organic HAP greater than 33 percent.
Gel coat application VOC emissions based on Table 1 to 40 CFR 63 subpart WWWW, Item 1.f. - atomized spray gel coat application, nonvapor-suppressed gel coat for materials with organic HAP less than 33 percent.

Marathon Coach
Emission Detail Sheets
Baghouse Emissions

Cabinet Shop (CS)

Max material collected =	1,600	lbs/month
Baghouse control efficiency =	99.9%	

Criteria Pollutants

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)
PM	2.2E-03	9.6E-03
PM_{10}	2.2E-03	9.6E-03
$PM_{2.5}$	2.2E-03	9.6E-03

Notes:

PM_{10} and $PM_{2.5}$ emissions are assumed to equal total particulate matter due to lack of information.

Facility estimates a maximum collection of 1600 pounds per month from Baghouse #1 and Baghouse #2 total.

Solid Surface (SS)

Max material collected =	37.5	lbs/month
Baghouse control efficiency =	99.9%	

Criteria Pollutants

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)
PM	5.1E-05	2.3E-04
PM_{10}	5.1E-05	2.3E-04
$PM_{2.5}$	5.1E-05	2.3E-04

Notes:

PM_{10} and $PM_{2.5}$ emissions are assumed to equal total particulate matter due to lack of information.

Facility estimates a maximum collection of 450 pounds per year in two bins serving the baghouse.

Wood Shop (WS)

Max material collected =	1,155.3	lbs/month
Baghouse control efficiency =	99.9%	

Criteria Pollutants

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)
PM	1.6E-03	6.9E-03
PM_{10}	1.6E-03	6.9E-03
$PM_{2.5}$	1.6E-03	6.9E-03

Notes:

PM_{10} and $PM_{2.5}$ emissions are assumed to equal total particulate matter due to lack of information.

Facility estimates a maximum collection of 800 pounds every three weeks in two bins serving the baghouse.

Marathon Coach
Emission Detail Sheets
Combustion Emissions

Combustion Specifications

Total Max Heat Input	8	MMBtu/hr
Heat Value - Natural Gas	1026	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor	NG Emission Factor Units	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
PM	2.5	lbs/MMCF	0.02	0.09
PM_{10}	2.5	lbs/MMCF	0.02	0.09
$PM_{2.5}$	2.5	lbs/MMCF	0.02	0.09
Carbon Monoxide	84	lbs/MMCF	0.65	2.87
Nitrogen Oxides	100	lbs/MMCF	0.78	3.42
Sulfur Dioxide	1.7	lbs/MMCF	0.01	0.06
Volatile Organic Compounds	5.5	lbs/MMCF	0.04	0.19
GHGs (as CO_2 equivalent)	117	lbs/MMBtu	937	4,103

HAP Emissions

Pollutant	CAS/DEQ Number	NG Emission Factor (lb/MMCF)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics						
Acetaldehyde	75-07-0	0.0043	3.4E-05	1.5E-04	Yes	Yes
Acrolein	107-02-8	0.0027	2.1E-05	9.2E-05	Yes	Yes
Benzene	71-43-2	0.008	6.2E-05	2.7E-04	Yes	Yes
Benzo[a]pyrene	50-32-8	0.0000012	9.4E-09	4.1E-08	Yes	Yes
Ethyl Benzene	100-41-4	0.0095	7.4E-05	3.2E-04	Yes	Yes
Formaldehyde	50-00-0	0.017	1.3E-04	5.8E-04	Yes	Yes
Hexane	110-54-3	0.0063	4.9E-05	2.2E-04	Yes	Yes
Naphthalene	91-20-3	0.0003	2.3E-06	1.0E-05	Yes	Yes
Polycyclic aromatic hydrocarbons (POM)	401	0.0001	7.8E-07	3.4E-06	Yes	Yes
Toluene	108-88-3	0.0366	2.9E-04	1.2E-03	Yes	Yes
Xylenes (mixture)	1330-20-7	0.0272	2.1E-04	9.3E-04	Yes	Yes
Inorganic Gases						
Ammonia	7664-41-7	3.2000	2.5E-02	1.1E-01	No	Yes
Metals						
Arsenic and compounds	7440-38-2	0.0002	1.6E-06	6.8E-06	Yes	Yes
Barium and compounds	7440-39-3	0.0044	3.4E-05	1.5E-04	No	Yes
Beryllium and compounds	7440-41-7	0.000012	9.4E-08	4.1E-07	Yes	Yes
Cadmium and compounds	7440-43-9	0.0011	8.6E-06	3.8E-05	Yes	Yes
Chromium VI particulate	18540-29-9	0.0014	1.1E-05	4.8E-05	Yes	Yes
Cobalt and compounds	7440-48-4	0.000084	6.5E-07	2.9E-06	Yes	Yes
Copper and compounds	7440-50-8	0.00085	6.6E-06	2.9E-05	No	Yes
Lead and compounds	7439-92-1	0.0005	3.9E-06	1.7E-05	Yes	Yes
Manganese and compounds	7439-96-5	0.00038	3.0E-06	1.3E-05	Yes	Yes
Mercury and compounds	7439-97-6	0.00026	2.0E-06	8.9E-06	Yes	Yes
Molybdenum trioxide	1313-27-5	0.00165	1.3E-05	5.6E-05	No	Yes
Nickel compounds, insoluble	365	0.0021	1.6E-05	7.2E-05	Yes	Yes
Selenium and compounds	7782-49-2	0.000024	1.9E-07	8.2E-07	Yes	Yes
Vanadium (fume or dust)	7440-62-2	0.0023	1.8E-05	7.9E-05	No	Yes
Zinc and compounds	7440-66-6	0.029	2.3E-04	9.9E-04	No	Yes
				Total Emissions (TPY) =	4.0E-03	0.11

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO_2)	53.06	1
Methane (CH_4)	1.0E-03	25
Nitrous Oxide (N_2O)	1.0E-04	298

Notes:

The facility has four (4) natural gas-fired make-up air units that have a maximum heat input rating of 2.0 MMBtu per hour each
Criteria pollutant emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)
GHG emission factors are from 40 CFR 98, Tables C-1 and C-2
Toxics emission factors, except ammonia, are based on DEQ Combustion Emission Factor Search Tool
Ammonia emission factor is based on US EPA WebFire SCC 1-002-006-02 for an uncontrolled boiler