

Facility Name: **Blue Bird Body Company**

City: Fort Valley

County: Peach

AIRS #: 04-13-225-00001

Application #: 909648

Date SIP Application Received: February 7, 2025

Date Title V Application Received: February 7, 2025

Permit No: 3713-225-0001-V-07-1

Program	Review Engineers	Review Managers
SSPP	Ginger Payment	Jeng-Hon Su
SSCP	N/A	N/A
ISMU	N/A	N/A
TOXICS	N/A	N/A
Permitting Program Manager		Steve Allison

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

B. Regulatory Status**1. PSD/NSR/RACT**

The 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}	✓			✓
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 application changes the site-wide VOC emission limitation to an equipment-specific VOC emission limitation. All combined equipment will continue to be subject to the previous facility wide limit of less than 250 tpy. There are no changes in emissions or equipment due to this application.

B. Emissions Change

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	0	0
PM ₁₀	yes	0	0
PM _{2.5}	yes	0	0
SO ₂	yes	0	0
VOC	yes	0	0
NO _x	yes	0	0
CO	yes	0	0
TRS	no	--	--
H ₂ S	no	--	--
Individual HAP	yes	0	0
Total HAPs	yes	0	0

C. PSD/NSR Applicability

The modification is not subject to PSD review because there are no emission increases and no proposed physical changes.

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

There are no changes to the facility-wide applicable rules and regulations due to this modification.

C. Compliance Status

There are no compliance issues noted during this application.

D. Permit Conditions

Condition 2.1.1 which concerned a facility-wide emission limit will be deleted due to this emission limit being relocated to Section 3 and will limit all emission units in current Table 3.1 and Attachment B of Permit No. 3713-225-0001-V-07-0 to less than 250 tpy.

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

There are no equipment changes due to this application.

C. Equipment & Rule Applicability

Emission and Operating Caps –

All equipment at the facility as shown in Table 3.1 of Permit No. 3713-225-0001-V-07-0 and equipment listed in Attachment B of Permit No. 3713-225-0001-V-07-0 will be limited to less than 250 tpy in order to avoid PSD review.

Applicable Rules and Regulations -

There are no changes to the applicable rules and regulations due to this application.

D. Permit Conditions

Condition 3.2.1 is a new condition which limits the VOC emissions from the emission units in Table 3.1 of Permit No. 3713-225-0001-V-07-0 and equipment listed in Attachment B of Permit No. 3713-225-0001-V-07-0 to less than 250 tpy.

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)

There are no additional monitoring requirements due to this application.

VII. Other Record Keeping and Reporting Requirements

- Condition 6.1.7b.1 was updated to refer to the emission units listed in Table 3.1 of Permit No. 3713-225-0001-V-07-0 and equipment listed in Attachment B of Permit No. 3713-225-0001-V-07-0.
- Conditions 6.2.3, 6.2.4 and 6.2.5 were updated to refer to the emission units listed in Table 3.1 of Permit No. 3713-225-0001-V-07-0 and equipment listed in Attachment B of Permit No. 3713-225-0001-V-07-0.

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.//