

**AIR EMISSION PERMIT NO. 14100059- 005**

**IS ISSUED TO**

**Harvest Partners Inc.**

New Flyer USA, Inc. – St. Cloud  
6200 Glenn Carlson Drive  
St. Cloud, Stearns County, MN 56301

New Flyer USA, Inc. is the operator of the facility. The facility is owned by Harvest Partners, Inc., 280 Park Avenue – 33<sup>rd</sup> Floor, New York, NY 10017.

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	July 17, 1998
Major Amendment	September 17, 2001
Major Amendment	May 22, 2002
Administrative Amendment	June 14, 2004

This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Federal; Part 70/Limits to Avoid New Source Review **Administrative Amendment**

**Issue Date:** August 12, 2003

**Issue Date:**

**Expiration:** August 12, 2008

All Title I Conditions do not expire.

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Richard Sandberg  
Air Quality Permits Section Manager  
Industrial Division

for Sheryl A. Corrigan  
Commissioner  
Minnesota Pollution Control Agency

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
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Outside Metro Area	1-800-657-3864
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TTY	(651) 282-5332
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The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

**FACILITY DESCRIPTION:**

New Flyer currently operates a bus manufacturing facility in St. Cloud, Minnesota. The plant currently consists of two manufacturing lines. The facility currently has one complete build line for bus assembly from parts (A-line) and one finishing line to complete partially assembled buses (B-line) shipped from the New Flyer facilities located in Winnipeg, Canada and Crookston, Minnesota.

The permit contains limits which restrict emissions to levels that are below the major source thresholds in 40 CFR § 52.21 and 40 CFR pt. 63, so the facility is considered a minor source under the New Source Review program and the National Emission Standards for Hazardous Air Pollutants for Source Categories. The facility is classified as a major source under 40 CFR pt. 70.

A description of the emission units, stack vents and control equipment at the facility are shown below:

<b>Emission Unit</b>	<b>Emission Unit Number</b>	<b>Stack/Vent Number(s)</b>	<b>Control Equipment Number(s)</b>
Primer Booth	EU 002	SV 001/002	CE 001
Undercoat Booth	EU 004	SV 003/004	CE 002
Paint Prep*	EU 006	SV 005	CE 010
Base Coat / Prime Booth	EU 007	SV 005/006	CE 003
Topcoat Booth	EU 008	SV 007/008	CE 004
Touch-up Booth	EU 009	SV 009/010/011	CE 005
Touch-up Booth	EU 010	SV 012/013/014	CE 006
Topcoat Booth	EU 011	SV 015/016/017	CE 007
Standby Diesel Generator	EU 014	SV 021	----
Bus Engine Testing*	EU 015	SV 022-037	----
Grit Blasting – not vented*	EU 016	----	----
Undercoating Booth No. 2	EU 017	SV 038/039	CE 011
Cleaning Solvents, Cleaners, Sealants and Adhesives Usage	EU 018	Various	----

\* Insignificant Activities

The control equipment (CE) at the facility at the time of permit issuance is shown below:

<b>Control Equipment (CE) Number</b>	<b>Description</b>
CE 001	Mat or Panel Filter
CE 002	Mat or Panel Filter
CE 003	Mat or Panel Filter
CE 004	Mat or Panel Filter
CE 005	Mat or Panel Filter
CE 006	Mat or Panel Filter
CE 007	Mat or Panel Filter
CE 010	Bag filter
CE 011	Mat or Panel Filter

**Permit Action 005 (Administrative Amendment):**

This permit action is for a change of ownership at the facility. The new owners are Harvest Partners, Inc. out of New York.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

**Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.**

**Subject Item: Total Facility**

What to do	Why to do it
<b>TOTAL FACILITY EMISSION LIMITS</b>	hdr
<p>Volatile Organic Compounds: less than or equal to 140.0 tons/year using 12-month Rolling Sum for all product usage at the facility.</p> <p>Emissions from fuel combustion need not be included in the calculation of VOC emissions until VOC emissions in any 12-month period exceed 137.0 tons. When the 12-month rolling sum of VOC emissions from usage of VOC-containing materials exceeds 137.0 tons in any 12-month period, VOC emissions from fuel combustion shall be calculated and added to the VOC emissions for the previous month and for the previous 12-month rolling sum calculations.</p>	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
HAPs - Total: less than or equal to 24.0 tons/year using 12-month Rolling Sum for all product usage at the facility.	Title I Condition: Limit to avoid 40 CFR 63.40 to 63.44
HAP-Single: less than or equal to 9.0 tons/year using 12-month Rolling Sum for all product usage at the facility.	Title I Condition: Limit to avoid 40 CFR 63.40 to 63.44
Lead: less than or equal to 1036 lbs/year using 12-month Rolling Sum (usage). The limit is on the weight of lead or lead compounds in coatings containing lead or lead compounds.	Minn. R. 7007.0020
Chromium: less than or equal to 134 lbs/year using 12-month Rolling Sum (usage) of chromium in coatings containing chromium or chromium compounds.	Minn. R. 7007.0800, subps. 2 and 5
Nickel: less than or equal to 200 lbs/year using 12-month Rolling Sum (usage) of nickel or nickel compounds in coatings containing nickel or nickel compounds.	Minn. R. 7007.0800, subps. 2 and 5
Recordkeeping - Lead, Chromium (elemental Chromium) and Nickel Usage	Minn. R. 7009.0020; Minn. R. 7007.0800, subp. 5
By the 15th day of each month, calculate and record the Lead (both Lead and Lead Compounds), elemental Chromium and Nickel (both Nickel and Nickel compounds) Usage for the previous month and for the previous 12-month period.	
<b>MONITORING</b>	hdr
<p>Determination of Material Content For Emission Calculations: VOC, HAP, and metal contents in all materials shall be determined by the Environmental Data Sheet (EDS) or the Material Safety Data Sheet (MSDS) provided by the supplier for each material used, except as specified below. If the EDS or MSDS provides a material content range, the highest number in the range shall be used in all calculations.</p> <p>Alternative methods approved by the MPCA may be used to determine material VOC, HAP, and metal contents. In addition, the Commissioner reserves the right to require the Permittee to determine the VOC, HAP, and metal contents of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the EDS or MSDS.</p>	Title I Condition: Monitoring to avoid classification as a major source under 40 CFR Sections 52.21 and to avoid 40 CFR Sections 63.40 to 63.44; Minn. R. 7007.0800, subp. 4
<p>Waste Credit: If the Permittee elects to obtain credit for HAPs, solids, and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or total and individual HAP content for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, total HAP, and each individual HAP, excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC, solids, and total and individual HAP content of any of the materials.</p>	Title I Condition: Monitoring to avoid classification as a major source under 40 CFR Sections 52.21 and to avoid 40 CFR Sections 63.40 to 63.44; Minn. R. 7007.0800, subp. 4
<b>RECORDKEEPING</b>	hdr

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

<p>Calculation of Mass of Shipped VOCs and HAPs - If the Permittee elects to obtain credit for VOC and HAP contained in shipped waste, calculate and record the mass of shipped VOCs, individual HAP, and total HAPs using billing records and analyses or MSDS/EDS, as appropriate. If a range of values is given, use the minimum values.</p> <p>Calculations and recordings shall be made by the fifteenth day of the month following the month that the waste was generated. Emission credits for shipped VOCs and HAPs shall be applied to the monthly emission calculation for the month that the waste was generated.</p>	<p>Title I Condition: Recordkeeping to avoid classification as a major source under 40 CFR Sections 52.21 and to avoid 40 CFR Sections 63.40 to 63.44; Minn. R. 7007.0800, subp. 5</p>
<p>Recordkeeping - VOC Emissions: for all VOC dispensed, calculate and record as follows:</p> <p>By the 15th day of each month, calculate and record the VOC emissions for the previous month (monthly VOC usage minus any VOC shipped as waste) and the previous 12-month period (by summing monthly VOC emissions data for the previous 12 months).</p> <p>If VOC emissions exceed 137.0 tons during the previous 12-month period, then VOC emissions from fuel combustion shall be calculated and added to total VOC emissions for the previous month and for the previous 12-month rolling sum calculations.</p>	<p>Title I Condition: Recordkeeping to avoid classification as a major source under 40 CFR Sections 52.21; Minn. R. 7007.0800, subp. 5</p>
<p>Recordkeeping - Single HAP Emissions: for each HAP dispensed, calculate and record as follows:</p> <p>By the 15th day of each month, calculate and record single HAP emissions for the previous month and the previous 12-month period (by summing all monthly single HAP emissions for the previous 12 months).</p>	<p>Title I Condition: To avoid 40 CFR Sections 63.40 to 63.44; Minn. R. 7007.0800, subp. 5</p>
<p>Recordkeeping - Total HAP Emissions:</p> <p>By the 15th day of each month:</p> <p>1) Calculate and record total HAP emissions for the previous month by summing all single HAP emissions data for the month;</p> <p>2) Calculate and record total HAP emissions for the previous 12-month period by summing all monthly total HAPs emissions data for the previous 12 months.</p>	<p>Title I Condition: To avoid 40 CFR Sections 63.40 to 63.44; Minn. R. 7007.0800, subp. 5</p>
<p>GENERAL REQUIREMENTS</p>	<p>hdr</p>
<p>Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.</p>	<p>Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)</p>
<p>Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Operation of Monitoring Equipment: Unless otherwise noted in Tables A or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.</p>	<p>Minn. R. 7011.0020</p>
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

**Subject Item: GP 002 Industrial Process Equipment Requirements****Associated Items:** EU 002 Primer Booth

EU 004 Undercoat Booth

EU 007 Base Coat/Prime Booth

EU 008 Topcoat Booth

EU 009 Touch-up Booth

EU 010 Touch-up Booth

EU 011 Topcoat Booth

EU 017 Undercoating Booth No. 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to meet the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This standard applies individually to each emission unit in GP 002. Other permit requirements (e.g., control requirements and coating usage limits) are more restrictive, for particulate matter emissions, than this rule. See GP 003, GP 004, EU 002, EU 004, and EU 006 for periodic monitoring requirements for particulate matter emissions.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This standard applies individually to each emission unit in GP 002. See GP 003 for periodic monitoring requirements for opacity.	Minn. R. 7011.0715, subp. 1(B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

**Subject Item:** GP 003 Panel Filter Requirements**Associated Items:** CE 001 Mat or Panel Filter

CE 002 Mat or Panel Filter

CE 003 Mat or Panel Filter

CE 004 Mat or Panel Filter

CE 005 Mat or Panel Filter

CE 006 Mat or Panel Filter

CE 007 Mat or Panel Filter

CE 011 Mat or Panel Filter

What to do	Why to do it
Particulate Matter < 10 micron: greater than or equal to 92 percent control efficiency .	Title I Condition: to avoid classification as a major source under 40 CFR Sections 52.21; Minn. R. 7009.0020; Minn. R. 7007.0800, subp. 14
Total Particulate Matter: greater than or equal to 92 percent control efficiency .	Title I Condition: to avoid classification as a major source under 40 CFR Sections 52.21; Minn. R. 7007.0800, subp. 14
Inspections: Once each operating day, the Permittee shall visually inspect the condition of the panel filters, including but not limited to, alignment, saturation, tears, and holes. The Permittee shall maintain a daily written record of filter inspections and maintenance.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7009.0020; Minn. R. 7007.0800, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

**Subject Item: EU 014 Standby Diesel Generator**

<b>What to do</b>	<b>Why to do it</b>
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input . Potential to emit for this unit, using the AP-42 emissions factor, is 0.29 lb/MMBtu.	Minn. R. 7011.2300, subp. 2
Sulfur Content of Fuel: less than 0.5 percent by weight	Minn. R. 7007.0800, subp. 2
Fuel Restriction: EU 014 fuel is restricted to distillate fuel oil.	Minn. R. 7007.0800, subp. 2
Recordkeeping - Hours of Operation: The Permittee shall record the number of hours the unit was operated at the end of each period of operation.	Minn. R. 7007.0800, subp. 5
Fuel Supplier Certification: obtain and maintain a fuel supplier certification for each shipment of diesel fuel, certifying that the sulfur content does not exceed 0.5% by weight.	Minn. R. 7007.0800, subps. 4 and 5

## TABLE B: SUBMITTALS

09/29/04

Facility Name: New Flyer USA Inc - St Cloud  
Permit Number: 14100059 - 005

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor  
Permit Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor  
Compliance Determination Unit  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460

**TABLE B: RECURRENT SUBMITTALS**

09/29/04

Facility Name: New Flyer USA Inc - St Cloud

Permit Number: 14100059 - 005

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 10/27/1998 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 10/27/1998 (for the previous calendar year). To be submitted on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year starting 10/27/1998 (April 1). To be submitted on a form approved by the Commissioner.	Total Facility

## **APPENDIX: INSIGNIFICANT ACTIVITIES**

**Facility Name: New Flyer Industries – St. Cloud**

**Permit Number: 14100059-005**

### **Insignificant Activities and Applicable Requirements**

<b>Minn. R. 7007.1300, subpart</b>	<b>Activity</b>	<b>Applicable Requirement(s)</b>
3(H)	Brazing, soldering or welding equipment	Minn. R. 7011.0510/0515, Minn. R. 7011.0610 and Minn. R. 7011.0710/0715
3(D)	Grit blasting area from which emissions are collected and routed to an air cleaning system which is vented inside of the building 100 percent of the time	Minn. R. 7011.0710/0715
4(B)	Paint prep area	Minn. R. 7011.0710/0715
4(A) & 4(B)	Bus engine testing	Minn. R. 7011.2300

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 14100059-005**

This Technical Support Document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

**1. General Information**

**1.1. Applicant and Stationary Source Location:**

Applicant/Address	Stationary Source/Address (SIC Code: 3711)
Mr. Ken Day, Environmental/Plant Engineer New Flyer USA, Inc. 6200 Glenn Carlson Drive St. Cloud, MN 56301	6200 Glenn Carlson Drive St. Cloud Stearns County
Contact: <b>Mr. Ken Day</b> Phone: <b>(320) 203-4781</b>	
<b>Corporate Owner:</b> Harvest Partners, Inc. 280 Park Avenue – 33 <sup>rd</sup> Floor New York, NY 10017	

**1.2. Description of the Facility**

New Flyer currently operates a bus manufacturing facility in St. Cloud, Minnesota. The plant currently consists of two manufacturing lines. The facility has one complete build line for bus assembly from parts (A-line) and one finishing line to complete partially assembled buses (B-line) shipped from the New Flyer facilities located in Winnipeg, Manitoba and Crookston, Minnesota. The facility began operating in September, 1999.

The complete-build and finishing lines produce articulated buses up to 60 feet in length and non-articulated buses up to 40 feet in length. The 60 foot buses consist of two, separate 30 foot “boxes”, while the non-articulated buses consist of one “box” and are 40 feet in length. Each line has the capacity to produce one box every four hours.

New Flyer has developed a new bus design, the Invero, which will be manufactured at the St. Cloud facility. This bus will be partially manufactured on the A-line and completed on the B-line.

The emission units, stack vents and control equipment at the facility are shown below:

<b>Emission Unit</b>	<b>Emission Unit Number</b>	<b>Stack/Vent Number(s)</b>	<b>Control Equipment Number(s)</b>
Primer Booth	EU 002	SV 001/002	CE 001
Undercoat Booth	EU 004	SV 003/004	CE 002
Paint Prep*	EU 006	SV 005	CE 010
Base Coat / Prime Booth	EU 007	SV 005/006	CE 003
Topcoat Booth	EU 008	SV 007/008	CE 004
Touch-up Booth	EU 009	SV 009/010/011	CE 005
Touch-up Booth	EU 010	SV 012/013/014	CE 006
Topcoat Booth	EU 011	SV 015/016/017	CE 007
Standby Diesel Generator	EU 014	SV 021	----
Bus Engine Testing*	EU 015	SV 022-037	----
Grit Blasting – not vented*	EU 016	----	----
Undercoating Booth No. 2	EU 017	SV 038/039	CE 011
Cleaning Solvents, Cleaners, Sealants and Adhesives Usage	EU 018	Various	----

\* Insignificant Activities

The control equipment (CE) at the facility at the time of permit issuance is shown below:

<b>Control Equipment (CE) Number</b>	<b>Description</b>
CE 001	Mat or Panel Filter
CE 002	Mat or Panel Filter
CE 003	Mat or Panel Filter
CE 004	Mat or Panel Filter
CE 005	Mat or Panel Filter
CE 006	Mat or Panel Filter
CE 007	Mat or Panel Filter
CE 010	Bag filter
CE 011	Mat or Panel Filter



### **1.3 Description of the Activities Allowed by this Permit Action**

An administrative amendment was received June 14, 2004 in accordance with Minn. R. 7007.1400, subp. 1(B) to request a change of ownership for the facility to Harvest Partners, Inc. out of New York.

## **2. Conclusion**

Based on the information provided by New Flyer, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 14100059-005, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:      Bonnie Nelson (permit writer/engineer)