

STATEMENT OF BASIS

Tiffin Motorhomes, Inc.
Red Bay, Alabama
Franklin County
Facility Number 704-0013

This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to continue the work and operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this renewal permit. Tiffin manufactures motor homes, and has a standard industrial classification of 3716. Based on the Title V permit renewal application, this facility is a potential major source for volatile organic compounds, hazardous air pollutants, and particulate matter. Air permits were issued in 2019 making this facility subject to NESHAPs for metal and wood coating.

WW-3, WW-5, WW-7, and SB-11 through SB-13

Wood, aluminum, and styrofoam components of the motor homes are cut and sanded to form the required parts. The particles from these processes are collected by vacuum systems and sent to bag houses and a cyclone to control the particulate matter. Cyclone WW-3 collects Styrofoam waste. Baghouses WW-5 and WW-7 collect sawdust from the cabinet shop.

Emissions Standards

Opacity

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.

Particulate Matter

These units shall not discharge into the atmosphere particulate matter in any one hour in excess of $E = 3.59 (P^{0.62})$ where P is the process weight in tons per hour, and E is the emissions in pounds per hour.

Expected Emissions

Potential particulate emissions from this facility are estimated to be 170 tons per year. Tiffin reported 2018 particulate emissions of 15 tons.

Periodic Monitoring

Visible emissions shall be monitored daily while the unit is operating, by someone familiar with Method 9 of 40 CFR 60 Appendix A. If visible emissions above normal are observed, corrective action shall be taken within 24 hours, and an additional visual observation shall be performed. A logbook of the visible observations required in Proviso 4(a) shall be retained for at least five years and available for inspection upon request. This logbook should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

Units WW-5 and WW-7 are required to meet the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, because the uncontrolled emissions from each unit are greater than 100 Tons Per Year. The controlled emissions from each of these units are expected to be less than 100 TPY. Daily monitoring of visible opacity will be sufficient because the controlled emissions from each unit are less than 100 tons per year. The indicator to be monitored is visible opacity. The means used to measure opacity is an observer familiar with Method 9 of 40 CFR 60 Appendix A. The performance criteria for the monitoring are specified in Method 9 of 40 CFR 60 Appendix A, and meet the requirements of 40 CFR 64.3(b). This facility is obligated to conduct the monitoring and record keeping required by this permit.

Paint Booths

Steel angles are welded and bolted to truck chassis before black paint is applied to the steel. Other booths are used for various coating and sanding work. Fugitive sources will be included in the records of VOC and HAP emissions.

Emissions Standards

Emissions of volatile organic compounds from all surface coating operations including, but not limited to coating, storage, cleanup, etc., shall not exceed 230 tons in any consecutive 12-month period based on the premise that all VOCs applied are emitted. The metal coating is subject to 40 CFR 63 subpart M, which limits organic HAP to 2.6 pounds per gallon of coating solids. Wood coating is subject to 40 CFR 63 subpart JJ, which limits VHAPs to an average of 1.0 pounds per pound of solids as delivered to the applicator.

Expected Emissions

The proposed permit limits VOC emissions to 230 tons in any 12-month period. Tiffin reported actual VOC emissions of 115 tons in 2018. Emissions of hazardous air pollutants are limited to 2.6 pounds per gallon of coating solids for metal coating and 1.0 pound of VHAP per pounds of solids for wood coating. Potential HAP emissions are estimated to be 150 tons per year.

Periodic Monitoring

Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents that pertain to this air permit upon request. These records shall contain the following information:

1. The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
2. The percent by weight of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
3. The percent by volume of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
4. Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in

- advance.
5. Complete inventories of the VOC and HAP containing materials (their usage, VOC content and HAP content) shall be made at the end of each calendar month.
 6. The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
 7. The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

A report summarizing the reporting requirements shall be submitted each calendar quarter, in a format approved by the Department in advance.

Emergency Generators GEN-2, GEN-3, and GEN-4

Tiffin has three emergency electric generators located at the office (GEN-4), main plant (GEN-2), and R&D building (GEN-3). All of these units are Spark Ignition Internal Combustion Engines fueled by natural gas. Generators 2 and 3 are not subject to the New Source Performance Standards for SI ICE, 40 CFR 60 subpart JJJJ, because they were installed before June 12, 2006.

Emissions Standards

Opacity

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.

Particulate Matter

These units shall not discharge into the atmosphere particulate matter in any one hour in excess of $E = 3.59 (P0.62)$ where P is the process weight in tons per hour, and E is the emissions in pounds per hour.

HAPs

These units are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 subpart ZZZZ. Generator 4 is subject to the NSPS 40 CFR 60 subpart JJJJ because it was manufactured after January 1, 2009.

Expected Emissions

If the generators operated continuously, potential air emissions could be 6 TPY NO_x, 167 TPY CO₂, 1 TPY CO, and 0.2 TPY VOC. Actual emissions from these units are expected to be a fraction of this because the generators are only used for emergency power.

Periodic Monitoring

Tiffin is required to have a non-resettable hour meter on each SI ICE, and keep records of maintenance on each emergency generator.

Gasoline Dispensing System

Tiffin has a 500 gallon above ground tank used for fueling vehicles with gasoline. The diesel tank, ST-1, is not listed in the permit because it is not a significant source of air emissions.

HAPs

This unit is subject to the National Emission Standards for Hazardous Air Pollutants for source category: Gasoline Dispensing Facilities, 40 CFR 63 subpart CCCCCC.

Expected Emissions

Annual air emissions from this unit are expected to be less than one ton of VOC.

Periodic Monitoring

Records of the monthly throughput of gasoline shall be kept.

Recommendations

I recommend issuing the attached Title V permit. The proposed monitoring is sufficient to demonstrate compliance with all applicable air regulations.

Hal Brock
Industrial Chemicals Section
Chemical Branch
Air Division

February 3, 2020