

Statement of Basis
Tiffin Motorhomes, Inc. (Red Bay)
704-0013

Introduction

Tiffin Motorhomes, Inc., (Tiffin) located in Red Bay has applied for renewal of Major Source Operating Permit (MSOP) No. 704-0013. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Admin. Code R. 335-3-16. The above-named applicant has requested authorization to perform the work or 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 (Department), in accordance with the terms and conditions of the permit.

A permitting action occurred on August 5, 2005, which added Unit No. X003. A permitting action occurred on September 14, 2009, which added Unit No. X004. The initial Title V MSOP was issued on February 10, 2010, and this permitting action incorporated earlier established limits from earlier Air Permits into this document. A permitting action occurred on January 19, 2012, which added Unit No. X006. A permitting action occurred on December 5, 2014, which added Unit No. X007. These changes were incorporated into the Title V permit on February 10, 2015. An Air Permit was issued on November 5, 2015, which added Unit No. X008. A permitting action occurred on May 27, 2016, which added Unit No. X009. A permitting action occurred on July 26, 2018, which added Unit No. X010. A permitting action occurred on July 1, 2019, which added Unit No. X014. These changes were incorporated into the Title V permit on February 10, 2020.

The initial Title V MSOP was issued on February 10, 2010, and this is the third renewal. The current MSOP expired on February 10, 2025. The initial renewal application was received on August 16, 2024.

The facility is located in Franklin County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Tiffin necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL0000000105900013).

This facility conducts the manufacture of motorhomes (SIC # 3716). The facility includes various assembly and painting operations. Based on the

Title V permit application, this facility is a major source for Title V standards for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). Tiffin is a synthetic minor source for Prevention of Significant Deterioration (PSD) purposes.

Since their last Title V issuance, a touchup booth, SB-39, has been removed from service and dismantled. Also, Tiffin wishes to remove the following units from service: SB-11, SB-12, SB-13, SB-24a, SB-14, SB-15, SB-25, SB-16/17, SB-18, SB-19, SB-24b. Two small emergency generators have been added to the plant and will be incorporated into the Title V with this issuance. The Department will also be removing the previously permitted Gasoline Dispensing Unit because the standard that was applied is no longer applicable (see below).

The following is a list of all of the facility's sources (individual emissions units) that will be part of the facility's Title V Major Source Operating Permit:

Permit Unit No.	Description of Unit
001	Particulate Sources Cyclones/Baghouses
002	Metal Surface Coating Operation
003	Wood Surface Coating Operations
004	RICE Sources

Particulate Operations with Cyclones/Baghouses (001)

Tiffin has many woodworking, aluminum, and Styrofoam operations that are subject to opacity and particulate standards. The particulate control devices for these operations consist of Cyclone No. WW3, Baghouse No. WW5, and Baghouse No. WW7.

Applicable Regulations

These operations are subject to the visible emissions standards found in ADEM Admin. Code R. 335-3-4-.01. These operations are subject to the process weight standards found in ADEM Admin. Code R. 335-3-4-.04.

Monitoring of Emissions

The baghouse(s) and cyclone(s) will be monitored for visible emissions. Currently, daily observations of visible emissions are done to maintain compliance with the particulate standards. If greater than normal emissions are noted, corrective action to minimize emissions will be taken within 24 hours. This will be followed by an additional observation to confirm that emissions are reduced to normal.

Units WW-5 and WW-7 are required to meet the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the uncontrolled emissions from each unit are greater than 100 tons per year (TPY). 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 TPY. 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 monitoring and record keeping required by this permit.

Recordkeeping and Reporting of Emissions

Records of daily observations and any corrective actions will be retained for at least five years and will be available to be reviewed by Departmental personnel during compliance inspections.

Coating Operations (002 and 003)

Tiffin has two booths that are used for painting various steel parts of the motorhome. Tiffin also has two wood coating lines and rework booths with warm air tunnels that are used for painting various wood parts for the motorhome.

Applicable Regulations

The metal coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Miscellaneous Metal Parts, Subpart MMMM, in 40 CFR Part §63.3880. This regulation requires Tiffin to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators.

The wood coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Manufacture of Wood Furniture, Subpart JJ, in 40 CFR Part §63.800. This regulation requires Tiffin to limit emissions of certain HAPs in their coatings and to implement certain work practices and training for operators.

The facility is subject to a Prevention of Significant Deterioration (PSD) synthetic minor emission limitation of 230 tons per year of VOC in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted.

The VOC synthetic minor PSD emission limitation (230 tons in any consecutive twelve-month period) was incorporated into the Title V Permit issued in 2010. The VOC limit has been included in all subsequent Title V permits. This limit is considered federally enforceable as EPA has stated that Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for the purposes of avoiding being subject to more stringent requirements. 40 CFR Part 70.6(b)(1) has been revised to clarify that such terms and conditions assumed at the request of the permittee for purposes of limiting a source's potential to emit are federally enforceable.

Testing of Emissions

No periodic testing of emissions is required. Tiffin uses manufacture's information based on Method 24 or 311 as appropriate for the coatings used in coating operations.

Recordkeeping and Reporting of Emissions

Tiffin will maintain records of monthly coating usage and coating analysis for each line to show compliance with Subpart JJ requirements, Subpart MMMM requirements, and the PSD limitation.

Monthly reports summarizing these records will be submitted quarterly to the Department.

Generators (004)

Tiffin has four emergency use only generators located at the facility: Warehouse (GEN-1), IT (GEN-2), and Main Plant Server IT (GEN-3), Server Room Engineering Bld (GEN-4). These are used for power outages and periodic testing only.

Applicable Regulations

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. 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.

These units are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart ZZZZ.

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 (NSPS) for SI ICE, 40 CFR 60 Subpart JJJJ, because they were installed before June 12, 2006. Generator 4 is subject to the NSPS 40 CFR 60 Subpart JJJJ because it was manufactured after January 1, 2009.

Testing of Emissions

There is no required testing.

Monitoring of Emissions

There is no regular monitoring of emissions, besides the hour meter requirements and regular periodic maintenance as required by the NESHAP. The units have shown compliance with the standards by certification by the manufacturer.

Gasoline Dispensing Operations (005)

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.

Applicable Regulations

The tanks are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Gasoline Dispensing Facilities, Subpart CCCCCC in 40 CFR Part 63.11110. Tiffin is a major source of HAPs, and this regulation only applies to area sources of HAP emissions. This regulation would require Tiffin to conduct Best Management Practices and demonstrate monthly throughput if it were applicable.

CAM

Compliance Assurance Monitoring (CAM) is not applicable for the NESHAP (MACT) regulations within this Title V permit because these regulations were proposed post November 15, 1990 (Wood Furniture Manufacturing and Surface Coating of Miscellaneous Metal Parts). CAM is applicable for the Title V permit for the baghouse units listed herein

because potential uncontrolled emissions of criteria pollutants exceed 100 tons per year on any one unit with a control device.

Fugitive Dust

The fugitive dust potential was evaluated and is not expected to be of concern at this facility. The plant property is grassed, and travel areas are covered by asphalt, concrete, or graveled surfaces. Wood waste and other material particulate matter will pass through a cyclone or baghouse before being emitted. No stockpiles of dust producing materials are planned. Therefore, it has been determined by the Department that a dust plan is not required at this time.

Permitting Fees

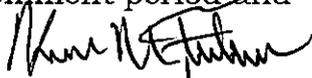
Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Standard practice is to notify of the issuance of this major source operating permit to all states bordering Alabama.

Recommendations

I recommend that the renewal Major Source Operating Permit be issued to Tiffin pending resolution of any comments received during the 30-day public comment period and 45-day EPA review.



February 2026

Kevin Fulmer

Chemical Branch

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