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Air Enforcement: Alabama Department of Environmental Management and Franklin County, Alabama Motorhome Manufacturing Facility Enter Into Consent Order Addressing Alleged Violations

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The Alabama Department of Environmental Management ("ADEM") and Tiffin Motorhomes, Inc. ("TMI") entered into a February 23rd Consent Order ("CO") addressing alleged violations of federal and/or Alabama air regulatory provisions. See Consent Order No. XX-XXX-CAP.

The CO states that TMI operates a motorhome manufacturing facility in Franklin County, Alabama.

The facility holds a Major Source Operating Permit ("Permit"). Section 2 of the Permit is stated to limit air emissions from the facility to 230 tons of Volatile Organic Compounds ("VOCs"), 24 tons of Hazardous Air Pollutants ("HAPs"), and 9 tons of any single HAP. The Permit further requires that TMI "keep accurate records of VOCs and HAPs in the paints and materials used at the facility. In addition, the Permit requires:

Within the first 15 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.

ADEM is stated to have received from TMI a Quarterly Emissions Report which showed emissions of 24.5 tons of HAP, 11.3 tons of xylene, the greatest single HAP, for the twelve month period ending September 2015. It is further stated that the report showed the emissions of xylene were 9.7 tons for the twelve month period ending July 2015, and 10.9 tons for the twelve month period August 2015 and that:

... emissions of xylene exceeding 9.0 tons should have been reported to the Department by July 25, 2015.

TMI is stated to have responded to an ADEM Notice of Violation and that:

... The reply to the NOV from the Permittee showing that the HAP emissions did not exceed the Permit limits. The corrected Third Quarter 2015 Report showed emissions of 17.5 tons of HAPs, 2.7 tons of xylene, and 5.7 tons of toluene for the twelve month period ending in September 2015. The Permittee attributed the change in HAP emissions amounts reported to it having used incorrect quantities and HAP context to calculate the emission levels.

The CO concluded that TMI failed to keep accurate records and report the monthly exceedances in a timely fashion, in violation of Section 5 of the Permit.

The CO provides that TMI neither admits nor denies ADEM contentions.

TMI agrees to the assessment of a civil penalty in the amount of \$12,000.00.

[Click here to download a copy of the CO.](#)