

# Iowa Department of Natural Resources

## Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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The Iowa Department of Natural Resources (DNR) finds that:

1. CDI, LLC – Charles City, located at 715 E Corporate Drive, Charles City, Iowa 50616 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Jason Chodorowski.
2. CDI, LLC – Charles City is a Top, Body, and Upholstery Repair Shops and Paint Shop facility. This facility consists of 7 emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	9.33
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	14.67
Particulate Matter	PM	20.41
Sulfur Dioxide	SO <sub>2</sub>	0.03
Nitrogen Oxides	NO <sub>x</sub>	5.15
Volatile Organic Compounds	VOC	188.28
Carbon Monoxide	CO	4.33
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	3.36

<sup>(1)</sup> May include the following: Ethylbenzene, Glycol Ethers, Hexane, Methanol, Toluene, and Xylene..

3. CDI, LLC – Charles City submitted a Title V Operating Permit renewal application on November 13, 2023. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from March 21, 2024 through April 20, 2024. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

## **Title V Application Review Notes**

Facility Name:	<b>CDI, LLC – Charles City</b>
SIC Code:	7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)
City:	Charles City
County:	Floyd (FO #2)
EIQ #:	92-6921
Facility #:	34-01-035
Permit #:	14-TV-012R2
Reviewer:	Zane Peters
Date:	02/01/24

### **Facility Identification**

Facility Name:	<b>CDI, LLC – Charles City</b>
Facility Location:	715 E Corporate Drive, Charles City, Iowa 50616
Responsible Official:	Jason Chodorowski
Phone:	(641) 585-5900

### **Background**

CDI, LLC – Charles City paints motor homes for Winnebago Industries, and has indicated in their construction permit applications that they may also paint other assembled vehicles like boats, trailers and buses.

The facility was issued an initial Title V Permit on 8/18/2006. The facility rescinded its construction permits and dropped out of Title V on 3/3/2011. They became a Title V source again 10/8/2012 when they resumed operation and entered into an Administrative Consent Order with the Iowa Department of Natural Resources for failing to obtain construction permits prior to resuming operation. The new initial Title V permit was issued 9/2/2014. The first renewal was issued 05/20/2019.

CDI, LLC – Charles City has applied for renewal of their Part 70 Title V Operating Permit. The facility consists of seven (7) significant emission units and one (4) insignificant unit. The application for the second renewal of the Title V operating permit was received on 11/13/2023.

## **Regulatory Status**

CDI, LLC is a major source for Title V. See Table 1 below for major source by pollutant.

**Table 1**  
**Title V Major Source by Pollutant**

<b>Pollutant</b>	<b>Major for Title V?</b>
PM <sub>10</sub>	<input type="checkbox"/>
SO <sub>2</sub>	<input type="checkbox"/>
NO <sub>x</sub>	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input type="checkbox"/>
Total HAPs	<input type="checkbox"/>

HAPs emitted from the facility include: Ethylbenzene, Glycol Ethers, Hexane, Methanol, Toluene, and Xylene.

## **Program Applicability**

- PSD: NO
- Part 60 NSPS: NO
- Part 61 NESHAP: NO
- Part 63 NESHAP: YES, emission units B1, B2, B4, B5, MR1, and FE are subject to 40 CFR 63 Subpart PPPP<sup>(1)</sup>.
- Major Source of HAPs: YES
- CSAPR: NO
- Acid Rain: NO. The facility does not generate electricity for wholesale or retail sale and does not own or operate one of the Phase I or Phase II units listed in 40 CFR 73.10.
- Stratospheric Ozone Protection: NO
- Prevention of Accidental Releases: NO
- CAM: NO

<sup>(1)</sup> The construction permits for the Paint Booths, Paint Mix Room and Final Repair Area state that the sources are subject to 40 CFR 63 Subpart PPPP **and** Subpart MMMM. However, when the Department evaluated the first permit, we came to the conclusions printed below.

### **40 CFR 63 Subpart PPPP – Surface Coating of Plastic Parts and Products**

*The facility is subject to this subpart and the facility complies with the following options:*

- *Subcategory: Assembled On-road Vehicle*

- *Organic HAP Limit: 1.34 lb organic HAPs per lb coating solids as a rolling 12-month emission rate and determined on a monthly basis.*
- *Compliance Option: Emission rate without add-on controls option.*
- *New sources because it was built after 12/4/02.*

*The assembled on-road vehicle coating subcategory includes surface coating of fully assembled motor vehicles and trailers intended for on-road use, including, but not limited to: automobiles, light-duty trucks, heavy duty trucks, and busses that have been repaired after a collision or otherwise repainted; fleet delivery trucks; and motor homes and other recreational vehicles (including camping trailers and fifth wheels). 40 CFR 63.4481(a)(5).*

*Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on ... motor homes and other recreational vehicles... . 40 CFR 63.4581.*

*The motor homes substrates include both plastics and metals. The preamble to the final rule states "we revised the scope of the assembled on-road vehicle subcategory to include the surface coating of fully assembled motor vehicles and trailers, including the coating of any metal substrate on the vehicle." [Federal Register Vol. 69, No. 75, p. 20978/April 19, 2004.]*

*The preamble to subpart PPPP's final rule further states "both the final rule and 40 CFR part 63, subpart MMMM state that the surface coating of all assembled on-road vehicles, including the coating of any metal substrate on the assembled vehicle will be subject to only the emission limits of the assembled on-road vehicle subcategory in the final rule." [Federal Register Vol. 69, No. 75, p. 20980/April 19, 2004.]*

*Therefore, all the motor home coating operations (including both plastic and metal coatings) as well as the coating of any other fully assembled on-road vehicles in the facility are subject to subpart PPPP for the subcategory of "assembled on-road vehicle" and the coating operations on the metal substrate of motor home vehicles in the facility are not subject to 40 CFR 63 subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products.*

*40 CFR 63 subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products.  
The facility is not subject to this subpart because it is subject to 40 CFR 63 subpart PPPP for the assembled on-road vehicle subcategory. 40 CFR 63.3881(c)(16).*

*However, if anything other than fully assembled vehicles are painted at the facility, it may be subject to subpart MMMM.*

## **Emission Point Changes**

### **General Changes**

- Permit numbers and permitting dates updated
- Responsible Official and Permit Contact information updated
- Supervisor of Air Operating Permits Section updated
- General Conditions updated to the most recent version

### **Emission Point-Specific Changes**

- Insignificant activities updated to include EUB1, EUB2, EUB4, & EUB5. Per renewal application, EU HT1 has been removed from the permit (pp. 4)

## **Periodic Monitoring/CAM**

Periodic monitoring requirements were evaluated based on the Department's Periodic Monitoring Guidance (PMG) document.

EPs B1A, B1B, B2A, & B2B – These emission points are paint booths/cure ovens with dry filters to control emissions. Due to Department policy towards painting operations, and Agency O&M Plan has been required for this renewal. Details of the plan can be found in the permit.

EPs B4A, B4B, B4C, B5A, B5B, & B5C – These emission points are paint booths/cure ovens with dry filters to control emissions. Due to Department policy towards painting operations, and Agency O&M Plan has been required for this renewal. Details of the plan can be found in the permit.

EP MR1 – This emission point is a Paint Mix Room with no control equipment to control emissions. Therefore, no CAM is required for this renewal.

EPs SAE1, SAE2, SAE3, & SAE4 – These emission points are part of the sanding area exhaust system with no control equipment to control emissions. Therefore, no CAM is required for this renewal.

EP FE – This emission point is the final repair area with dry filters to control emissions. Due to Department policy towards painting operations, and Agency O&M Plan has been required for this renewal. Details of the plan can be found in the permit.

## **Stack Testing**

No stack testing is required at this time.

## **Other Notes**

The facility has been audited by the Department's Emissions Inventory group and was completed on May 25, 2018. The audit covered the decrease in emissions, which was solely based on a decrease in gallons sprayed between the 2016 and 2017 year's EIQ. The initial audit continued

with a full Title V Emission Inventory Review, completed on August 9, 2018, which determined that the basis of calculating the VOC and HAP emissions was acceptable. Other notes from the review conclude that the facility did not include emissions from the ovens in the emissions inventory (CO, NO<sub>x</sub>, SO<sub>2</sub>, and hexane emissions). The review concluded with suggesting the facility report emissions by process, not release point, as well as using a painting calculator to better estimate potential emissions from the painting process.