

Statement of Basis

**Permit to Construct No. P-2016.0058
Project ID 62788**

**Western Trailer Co.
Boise, Idaho**

Facility ID 001-00337

Final

**March 10, 2022
Zach Pierce
Permit Writer**

A handwritten signature in black ink, consisting of the letters 'ZP' in a cursive, stylized font.

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
PAH	polyaromatic hydrocarbons
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho

scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Western Trailer operates a truck trailer manufacturing facility. Existing emission sources at the facility include natural gas direct-fired unit heaters, paint spray booth, paint solvent recycling, blast-cleaning booth, welding, metal routers, and aluminum saw.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

June 29, 2020	P-2016.0058, PTC modification to increase the aluminum use limit, Permit status (A, but will become S upon issuance of this permit)
January 16, 2019	P-2016.0058, PTC modification to increase permitted welding material usage and decrease permitted natural gas usage, Permit status (S)
September 20, 2018	P-2016.0058, PTC modification to increase permitted welding material usage, Permit status (S)
March 16, 2017	P-2016.0058, Initial PTC for an existing truck trailer manufacturing facility, Permit status (S)

Application Scope

This PTC is for a minor modification at an existing minor facility.

The applicant has proposed to:

- Install and operate 4 more natural gas combustion heaters
- Relocate the aluminum welding limits from Building 8 to Building 1

Application Chronology

January 3, 2022	DEQ received an application and an application fee.
January 10 – January 25, 2022	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 31, 2022	DEQ determined that the application was complete.
February 2, 2022	DEQ made available the draft permit and statement of basis for peer and regional office review.
February 9, 2022	DEQ made available the draft permit and statement of basis for applicant review.
March 3, 2022	DEQ received the permit processing fee.
March 10, 2022	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
MAU1	<u>MAU1 Paint Shop Dry Heater:</u> Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat input rating: 1.5 MMBtu/hr Fuel: Natural Gas	None	Paint R1
MAU2	<u>MAU2 Paint Shop Wash Bay Heater:</u> Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat Input Rating: 1.5 MMBtu/hr Fuel: Natural Gas	None	Paint R2
MAU3	<u>MAU3 Paint Booth Heaters:</u> Manufacturer: Viking Model: ANSZ83.4 (2) Manufacture Date: 1998 Heat Input Rating: 5.6 MMBTU/hr Fuel: Natural Gas	None	Paint V1-6
H1	<u>H1 Building 1 Space Heater:</u> Manufacturer: Reznor Model: FT-30 Manufacture Date: 1998 Heat Input Rating: 0.3 MMBTU/hr Fuel: Natural Gas	None	BLD1 D6
H2	<u>H2 Building 1 Unit Heaters:</u> Manufacturer: RE-VERBER-RAY Model: DR100 (50) Manufacture Date: 1998 Heat Input Rating: 5.0 MMBTU/hr total Fuel: Natural Gas	None	BLD1 windows and doors
H3	<u>H3 Building 1 Tool Room Furnace:</u> Manufacturer: Bryant Model: Indirect-Fired Manufacture Date: 1998 Rating: 0.046 MMBTU/hr Fuel: Natural Gas	None	BLD1 D7
H4	<u>H4 Building 1 Office Furnaces:</u> Manufacturer: Bryant Model: Indirect-Fired Manufacture Date: 1998 (5) Heat Input Rating: 0.575 MMBTU/hr total Fuel: Natural Gas	None	BLD1 D8-D12
H5	<u>H5 Building 8 Unit Heaters:</u> Manufacturer: Reznor Model: FE250-H Direct-Fired Manufacture Date: 2001 (2) Heat Input Rating: 0.42 MMBTU/hr total Fuel: Natural Gas	None	BLD8 D2-D3

Source ID No.	Sources	Control Equipment	Emission Point ID No.
H6	<u>H6 Building 8 Training Room Furnace:</u> Manufacturer: Trane Model: TUE100A948K2 Manufacture Date: 1999 Heat Input Rating: 0.10 MMBTU/hr Fuel: Natural Gas	None	BLD8 D4
H7	<u>H7 Building 10 Welding Area Unit Heaters:</u> Manufacturer: RE-VERBER-RAY Model: DR100 Manufacture Date: 1998 (8) Heat Input Rating: 0.8 MMBTU/hr total Fuel: Natural Gas	None	BLD10 doors and vents
H8	<u>H8 Building 10 Machine Shop Area Unit Heaters:</u> Manufacturer: Modine Model: PDP125AED130 Manufacture Date: 2005 (3) Heat Input Rating: 0.375 MMBTU/hr total Fuel: Natural Gas	None	BLD10 D2-D4
H9	<u>H9 Building 10 Office Furnaces:</u> Manufacturer: Bryant Model: Plus 90 Manufacture Date: 2005 (2) Heat Input Rating: 0.12 MMBTU/hr total Fuel: Natural Gas	None	BLD10 D5-D6
H10	<u>H10 Blast Building Heaters:</u> Manufacturer: Reznor Model: UDAS-300 Manufacture Date: 1998 (2) Heat Input Rating: 0.60 MMBTU/hr total Fuel: Natural Gas	None	BLST1-2
H11	<u>H11 Building 1 Addition Heaters:</u> Manufacturer: Space-Ray Model: RSCA10-N5B Manufacture Date: 2021 (4) Heat Input Rating: 0.416 MMBTU/hr total Fuel: Natural Gas	None	BLD1A D1-D4
MB1	<u>MB1 Media Blast:</u> Manufacturer: CLEMCO Model: 3661 Manufacture Date: 1998 Max. Capacity: 10 ft ³	<u>F1 Filter:</u> Manufacturer: CAMFILL FARR Model: GS-20 Filter efficiency: 99.7%	F1 exhaust
	<u>Welders (84):</u> Manufacturer: Lincoln, Miller, Hypermax Types: Mig/Tig, GMAW, SMAW, plasma Manufactured: 1998-2014	None	BLD1, 10 vents and doors
R1	<u>R1 Multicam Router:</u> Manufacturer: Multicam Model: 5500 Manufacture Date: 1998	<u>T1 Cyclone Bag Dust Collector:</u> Manufacturer: Donalds on Torit Model: GS20 Filter Efficiency: 99.9%	T1 exhaust

Source ID No.	Sources	Control Equipment	Emission Point ID No.
R2	<u>R2 Komo Router:</u> Manufacturer: Komo Model: M2 512S SHO Manufacture Date: 1998	<u>T2 Cyclone Bag Dust Collector:</u> Manufacturer: Donaldson n Torit Model: DFT 3-18 Filter Efficiency: 99.9%	T2 exhaust
S1	<u>S1 Aluminum Saw:</u> Manufacturer: SOCO Model: M2MC-260N/FA Manufacture Date: 1998	<u>T3 Cyclone Bag Dust Collector:</u> Manufacturer: Donaldson n Torit Model: GS20-5 Filter Efficiency: 99.9%	T3 exhaust
D1	<u>D1 Deburring Machines (2):</u> Manufacturer: COSTA Model: MD4CVC1150 Manufacture Date: 2015/2016 Max. Capacity: approx. 10,000 lb/day	<u>T4 Downflow II:</u> Manufacturer: Donaldson n Torit Model: DFT 3-18 Filter Efficiency: 95%	T4 exhaust
PB	<u>Paint Booth:</u> Type: Side Draft Manufacture Date: 1998	<u>Spray Guns:</u> Graco G-40 air assisted airless HVLP Transfer Efficiency: 85% Graco PRO XP Electrostatic Transfer Efficiency: 85% <u>Filter: UltraII/Ultra</u> Filter Efficiency: 99.90% combined	Paint V1-6
SR1	<u>SR1 Solvent Recycling:</u> Manufacturer: Becca Model: 9725 Manufacture Date: 1998 6 gallon usable capacity	None	Paint Storage BLD vents

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the heater operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission factors from AP-42, operation of 8,760 hours per year, and process information specific to the facility for this proposed project. Relocating the aluminum welding limits from Building 8 to Building 1 doesn't impact the Potential to Emit.

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Paint Building MAU1	0.011	0.025	0.001	0.002	0.147	0.322	0.124	0.271	0.008	0.018
Paint Building MAU2	0.011	0.025	0.001	0.002	0.147	0.322	0.124	0.271	0.008	0.018
Paint Building MAU3	0.042	0.105	0.003	0.008	0.548	1.380	0.460	1.160	0.030	0.076
Blast Building Heaters	0.004	0.010	0.000	0.001	0.059	0.129	0.049	0.108	0.003	0.007
Building 1 Heater 1	0.000	0.000	0.000	0.000	0.003	0.006	0.002	0.005	0.000	0.000
Building 1 Heater 2	0.037	0.082	0.003	0.006	0.489	1.070	0.412	0.902	0.027	0.059
Buildings Heaters (sic)	0.003	0.007	0.000	0.001	0.041	0.090	0.035	0.076	0.002	0.005
Building 10 Heaters	0.008	0.017	0.001	0.002	0.127	0.278	0.107	0.234	0.007	0.015
Building 8 Training Rm Heater	0.001	0.002	0.000	0.000	0.010	0.022	0.008	0.018	0.001	0.001
Paint Spray Booth	0.004	0.008	0.000	0.000	0.000	0.000	0.000	0.000	11.64	29.04
Solvent Recycling	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.010	0.020
Media Blasting Blast Bldg.	0.133	0.277	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Welding	0.225	0.431	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Cutting Bldg. 1	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Cutting Bldg. 10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Deburring Bldg. 1	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Pre Project Totals	0.48	0.99	0.01	0.02	1.57	3.62	1.32	3.05	11.74	29.26

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility’s classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Paint Building MAU1	0.011	0.025	0.001	0.002	0.147	0.322	0.124	0.271	0.008	0.018
Paint Building MAU2	0.011	0.025	0.001	0.002	0.147	0.322	0.124	0.271	0.008	0.018
Paint Building MAU3	0.042	0.105	0.003	0.008	0.548	1.380	0.460	1.160	0.030	0.076
Blast Building Heaters	0.004	0.010	0.000	0.001	0.059	0.129	0.049	0.108	0.003	0.007
Building 1 Heater 1	0.000	0.000	0.000	0.000	0.003	0.006	0.002	0.005	0.000	0.000
Building 1 Heater 2	0.037	0.082	0.003	0.006	0.489	1.070	0.412	0.902	0.027	0.059
Buildings Heaters (sic)	0.003	0.007	0.000	0.001	0.041	0.090	0.035	0.076	0.002	0.005
Building 10 Heaters	0.008	0.017	0.001	0.002	0.127	0.278	0.107	0.234	0.007	0.015
Building 8 Training Rm Heater	0.001	0.002	0.000	0.000	0.010	0.022	0.008	0.018	0.001	0.001
Paint Spray Booth	0.004	0.008	0.000	0.000	0.000	0.000	0.000	0.000	11.64	29.04
Solvent Recycling	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.010	0.020
Media Blasting Blast Bldg.	0.133	0.277	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Welding	0.225	0.431	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Cutting Bldg. 1	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Cutting Bldg. 10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Deburring Bldg. 1	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Bldg. 1 Expansion Heaters	0.003	0.014	0.000	0.001	0.041	0.18	0.034	0.15	0.002	0.01
Post Project Totals	0.48	1.00	0.01	0.02	1.61	3.80	1.36	3.20	11.74	29.27

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.48	0.99	0.01	0.02	1.57	3.62	1.32	3.05	11.74	29.26
Post Project Potential to Emit	0.48	1.00	0.01	0.02	1.61	3.80	1.36	3.20	11.74	29.27
Changes in Potential to Emit	0.00	0.01	0.00	0.00	0.04	0.18	0.04	0.15	0.00	0.01

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 5 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Dichlorobenzene	1.73E-05	1.78E-05	4.89E-07	2.00E+01	No
Toluene	1.98E-02	1.98E-02	1.39E-06	2.50E+01	No
Hexane	0.00E-03	7.34E-04	7.34E-04	1.20E+01	No
Manganese	8.69E-03	8.69E-03	1.55E-07	6.70E-02	No
Molybdenum	1.33E-03	1.33E-03	4.49E-07	6.67E-01	No
Barium	6.79E-05	6.97E-05	1.79E-06	3.30E-02	No
Chromium	4.87E-04	4.87E-04	5.71E-07	3.30E-02	No
Cobalt	3.82E-05	3.82E-08	3.43E-08	3.30E-03	No
Zinc	2.53E-03	2.54E-03	1.18E-05	3.33E-01	No
Copper	4.08E-03	4.08E-03	3.47E-07	1.30E-02	No
Selenium	3.70E-07	3.79E-07	9.79E-09	1.30E-02	No
Vanadium	0.00E-03	9.79E-09	9.79E-09	3.00E-03	No

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Formaldehyde	3.5E-04	3.81E-04	3.1E-05	5.1E-04	No
Benzo(a)pyrene	5.6E-09	6.09E-09	4.9E-10	2.0E-06	No
2-Methylnaphthalene	0.00E-03	9.8E-09	9.8E-09	9.1E-05	No
3-Methylchloranthene	8.3E-09	9.03E-09	7.3E-10	2.5E-06	No
Benzene	9.7E-06	1.06E-05	8.6E-07	8.0E-04	No
Nickel	2.91E-05	3.06E-05	8.6E-07	2.7E-05	No
Arsenic	9.3E-07	1.01E-06	8.2E-08	1.5E-06	No
Beryllium	1.37E-07	1.42E-07	4.9E-09	2.8E-05	No
Cadmium	5.1E-06	5.55E-06	4.5E-07	3.7E-06	No
Polyaromatic Hydrocarbon (Max)	3.1E-06	3.62E-06	5.2E-07	2.0E-06	No
Polycyclic Organics: 7-PAH Group	5.3E-08	5.76E-08	4.6E-09	9.1E-05	No

All changes in emissions rates for carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 7 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (T/yr)
Arsenic	4.46E-06
Benzene	4.68E-05
Beryllium	4.41E-07
Cadmium	2.40E-05
Chromium Compounds	1.10E-03
Chromium +6	2.10E-05
Cobalt Compounds	6.52E-05
Dichlorobenzene	2.61E-05
Ethylbenzene	8.40E-01
Formaldehyde	1.63E-03
Hexane	4.02E-02
Lead	1.00E-05
Manganese	2.40E-02
Methyl isobutyl ketone	3.30E-01
Mercury	5.76E-06
Naphthalene	1.31E-05
Nickel Compounds	4.84E-04
Polycyclic Organic Matter	2.31E-06
Selenium	5.33E-07
Toluene	4.90E-02
Xylene	1.00E+00
Totals	2.29

Ambient Air Quality Impact Analyses

The post-project emission rates of all criteria pollutants, except VOC, are below regulatory concern; therefore modelling for criteria pollutants is not required for this project. Additionally, the increases in individual TAP emissions associated with this project are less than the corresponding screening emission levels; consequently, modeling of TAPs is also not required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Ada County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all

uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

Table 8 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM ₁₀	306	1.00	100	SM
PM _{2.5}	306	1.00	100	SM
SO ₂	0.04	0.02	100	B
NO _x	7.34	3.80	100	B
CO	6.16	3.20	100	B
VOC	51.31	29.27	100	B
HAP (single)	2.1	1.00	10	B
Total HAPs	4.67	2.29	25	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.3, 3.4, 4.3, and 5.5.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, and VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT/GACT Applicability (40 CFR 63)

The facility may be subject to 40 CFR 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. However, upon inspection of Table 1 to this subpart, the facility is not primarily engaged in any of the nine subject source categories.

The facility may be subject to 40 CFR Part 63, Subpart MMMM NESHAP: Surface Coating of Miscellaneous Metal Parts and Products. However, this category affects a miscellaneous metal parts and products surface coating facility that is a major source, or is located at a major source, or is part of a major source of HAP emissions. Since the facility is not a major source and is not a major source of HAP emissions, this subpart does not apply to Western Trailer.

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions and is subject to the requirements of 40 CFR 63, Subpart HHHHHH–National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The facility has applied for an exemption from the EPA. EPA accepted the Petition for exemption from 40 CFR 63, Subpart HHHHHH in a letter dated July 28, 2017, see Appendix B. Therefore, Permit conditions related to the Subpart, ensuring regulation in accordance with this subpart, have been removed.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Revised Permit Condition 2.1 through 2.4

These permit conditions have been revised to include the new heaters, H11, for the combustion sources requirements.

Revised Permit Conditions 4.1 and 4.2

These permit conditions have been revised to reflect the relocation of the aluminum welding operation from Building 8 to Building 1.

Revised Permit Conditions 4.4

These permit conditions have been revised to reflect the relocation of the aluminum welding operation from Building 8 to Building 1. The new aluminum usage limit for Building 1 was created by combining the previously permitted limits for Building 1 and Building 8; therefore, there is no emissions increase as a result of this change.

Revised Permit Conditions 5.3

This permit condition has been revised to correct the discrepancy between the old permit limits and the stated potential to emit of the paint booth.

Deleted Permit Conditions 5.14 through 5.18

Western Trailer submitted a Petition for Exemption documentation to the EPA in October 2016 indicating that none of the coatings sprayed at the Western Trailer Company contain target HAP. EPA accepted the Petition for exemption from 40 CFR Part 63, Subpart HHHHHH in a letter dated July 28, 2017 (see Appendix B). Consequently, in accordance with the accepted Petition, 6H requirements do not apply to Western Trailer. Therefore, the requirements associated with Subpart HHHHHH were deleted.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – EMISSIONS INVENTORIES

Western Trailer
Table 4-1 Facility Wide Regulated Potential to Emit Emissions Summary

Table 4-1a: Pre-Project Potential to Emit (based on IDEQ Statement of Basis June 20, 2020)

Emissions Unit	PM _{2.5}	PM ₁₀	SO ₂	NO ₂	CO	VOC	Lead	Greenhouse Gases CO ₂ e
	tons/yr							
Paint Buiding MAU1	0.03	0.03	0.00	0.32	0.27	0.02	not listed	not listed
Paint Buiding MAU2	0.03	0.03	0.00	0.32	0.27	0.02	not listed	not listed
Paint Buiding MAU3	0.11	0.11	0.01	1.38	1.16	0.08	not listed	not listed
Blast Building Heaters	0.01	0.01	0.00	0.13	0.11	0.01	not listed	not listed
Building1 Heater1	0.00	0.00	0.00	0.01	0.01	0.00	not listed	not listed
Building1 Heaters2	0.08	0.08	0.00	1.07	0.90	0.06	not listed	not listed
Building8 Heaters	0.01	0.01	0.00	0.09	0.08	0.01	not listed	not listed
Building10 Heaters	0.02	0.02	0.00	0.28	0.23	0.02	not listed	not listed
Building 8 Training Rm Heater	0.00	0.00	0.00	0.02	0.02	0.00	not listed	not listed
Paint Spray Booth	0.01	0.01	0.00	0.00	0.00	29.00	not listed	not listed
Solvent Recycling	0.00	0.00	0.00	0.00	0.00	0.02	not listed	not listed
Media Blasting Blast Bldg	0.28	0.28	0.00	0.00	0.00	0.00	not listed	not listed
Welding	0.41	0.41	0.00	0.00	0.00	0.00	not listed	not listed
Metal Cutting Bldg 1	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Metal Cutting Bldg 10	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Metal Deburring Bldg 1	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Bldg 1 Expansion Heaters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total =	0.97	0.97	0.02	3.62	3.05	29.22	0.00	0.00

Table 4-1b: Post-Project Potential to Emit (based on IDEQ Statement of Basis June 20, 2020 and Bldg 1 Expansion Heaters requested permit conditions)

Emissions Unit	PM _{2.5}	PM ₁₀	SO ₂	NO ₂	CO	VOC	Lead	Greenhouse Gases CO ₂ e
	tons/yr							
Paint Buiding MAU1	0.03	0.03	0.00	0.32	0.27	0.02	not listed	not listed
Paint Buiding MAU2	0.03	0.03	0.00	0.32	0.27	0.02	not listed	not listed
Paint Buiding MAU3	0.11	0.11	0.01	1.38	1.16	0.08	not listed	not listed
Blast Building Heaters	0.01	0.01	0.00	0.13	0.11	0.01	not listed	not listed
Building1 Heater1	0.00	0.00	0.00	0.01	0.01	0.00	not listed	not listed
Building1 Heaters2	0.08	0.08	0.00	1.07	0.90	0.06	not listed	not listed
Building8 Heaters	0.01	0.01	0.00	0.09	0.08	0.01	not listed	not listed
Building10 Heaters	0.02	0.02	0.00	0.28	0.23	0.02	not listed	not listed
Building 8 Training Rm Heater	0.00	0.00	0.00	0.02	0.02	0.00	not listed	not listed
Paint Spray Booth	0.01	0.01	0.00	0.00	0.00	29.00	not listed	not listed
Solvent Recycling	0.00	0.00	0.00	0.00	0.00	0.02	not listed	not listed
Media Blasting Blast Bldg	0.28	0.28	0.00	0.00	0.00	0.00	not listed	not listed
Welding	0.41	0.41	0.00	0.00	0.00	0.00	not listed	not listed
Metal Cutting Bldg 1	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Metal Cutting Bldg 10	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Metal Deburring Bldg 1	0.00	0.00	0.00	0.00	0.00	0.00	not listed	not listed
Bldg 1 Expansion Heaters ¹	0.01	0.01	0.00	0.18	0.15	0.01	0.000001	212.67
Total =	0.99	0.99	0.02	3.80	3.20	29.23	0.00	212.67

Table4-1c: Changes in Potential to Emit

Emissions Unit	PM _{2.5}	PM ₁₀	SO ₂	NO ₂	CO	VOC	Lead	Greenhouse Gases CO ₂ e
	tons/yr							
Paint Buiding MAU1	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Paint Buiding MAU2	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Paint Buiding MAU3	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Blast Building Heaters	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Building1 Heater1	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Building1 Heaters2	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Building8 Heaters	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Building10 Heaters	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Building 8 Training Rm Heater	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Paint Spray Booth	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Solvent Recycling	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Media Blasting Blast Bldg	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Welding	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Metal Cutting Bldg 1	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Metal Cutting Bldg 10	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Metal Deburring Bldg 1	0.000	0.000	0.000	0.000	0.000	0.000	not listed	not listed
Bldg 1 Expansion Heaters ¹	0.014	0.014	0.001	0.179	0.150	0.010	0.000	212.67
Total =	0.014	0.014	0.001	0.179	0.150	0.010	0.000	212.67

¹Whereas emissions from other units are estimated using restricted controlled amounts, emissions from Bldg 1 Expansion Heaters are estimated based on unrestricted uncontrolled use.

Western Trailer
Table 4-2 Criteria Pollutant Emissions Increase

Criteria Air Pollutants ¹	PTE Emissions	
	lb/hr	T/yr ²
NO _x	0.0	0.2
CO	0.03	0.15
PM ₁₀	0.003	0.014
PM _{2.5}	0.003	0.014
SO ₂	0.000	0.001
VOC	0.00	0.01
Lead	2.0E-07	8.9E-07
	6.1E-06	lb/month
Total Criteria Emissions (ton/yr) =		0.35

Significance Threshold	
T/yr	Exceed?
40	No
100	No
15	No
10	No
40	No
40	No
0.6	No

Below Regulatory Concern	
T/yr	Exceed?
4	No
10	No
1.5	No
1	No
4	No
4	No
0.06	No

Table 4-3 Facility Wide TAP Pollutant Emissions Increase

Non-Carcinogenic Toxic Air Pollutant (24 hr Average)	CAS	Uncontrolled Unrestricted Hourly Emission Change (lbs./hr.)	Screening Emission Level (lb/hr)	Exceeds BRC Exemption? (Uncontrolled Emission ≤ 10% EL)	Exceeds Level I Exemption? (Uncontrolled Emission ≤ EL)	Uncontrolled Unrestricted Emission Change % of Screening Emission Level
Dichlorobenzene	95-50-1	4.89E-07	2.00E+01	No	No	0.00%
Toluene	108-88-3	1.39E-06	2.50E+01	No	No	0.00%
Hexane	110-54-3	7.34E-04	1.20E+01	No	No	0.01%
Mn - fume	7439-96-5	1.55E-07	6.70E-02	No	No	0.00%
Molyb	7439-98-7	4.49E-07	6.67E-01	No	No	0.00%
Ba	7440-39-3	1.79E-06	3.30E-02	No	No	0.01%
Cr	7440-47-3	5.71E-07	3.30E-02	No	No	0.00%
Co	7440-48-4	3.43E-08	3.30E-03	No	No	0.00%
Zn - fume	7440-66-6	1.18E-05	3.33E-01	No	No	0.00%
Cu - fume	7440-50-8	3.47E-07	1.30E-02	No	No	0.00%
Se	7782-49-2	9.79E-09	1.30E-02	No	No	0.00%
Vandium	1314-62-1	9.79E-09	3.00E-03	No	No	0.00%
Zinc Oxide - fume	1314-13-2	1.18E-05	3.33E-01	No	No	0.00%
Carcinogenic Toxic Air Pollutant (Annual Average)	CAS	Uncontrolled Unrestricted Hourly Emission Change (lbs./hr.)	Screening Emission Level (lb/hr)	Exceeds BRC Exemption? (Uncontrolled Emission ≤ 10% EL)	Exceeds Level I Exemption? (Uncontrolled Emission ≤ EL)	Uncontrolled Unrestricted Emission Change % of Screening Emission Level
Formaldehyde	50-00-0	3.1E-05	5.1E-04	No	No	6.00%
Benzo(a)pyrene	50-32-8	4.9E-10	2.0E-06	No	No	0.02%
2-Methylnaphthalene		9.8E-09	9.1E-05	No	No	0.01%
3-Methylchloranthene	56-49-5	7.3E-10	2.5E-06	No	No	0.03%
Benzene	71-43-2	8.6E-07	8.0E-04	No	No	0.11%
Nickel	7440-02-0	8.6E-07	2.7E-05	No	No	3.17%
Arsenic	7440-38-2	8.2E-08	1.5E-06	No	No	5.44%
Beryllium	7440-41-7	4.9E-09	2.8E-05	No	No	0.02%
Cadmium	7440-43-9	4.5E-07	3.7E-06	Yes	No	12.13%
Polyaromatic Hydrocarbon (Max)		5.2E-07	2.0E-06	Yes	No	26.12%
Polycyclic Organics: 7-PAH Group		4.6E-09	9.1E-05	No	No	0.01%

Table 4-4 Facility-Wide Hazardous Air Pollutant Emission Summary

Hazardous Air Pollutants	Pre-Project Emissions¹	Post-Project Emissions	Emission Change
	(T/yr)	(T/yr)	(T/yr)
Arsenic	4.10E-06	4.46E-06	3.57E-07
Benzene	4.30E-05	4.68E-05	3.75E-06
Beryllium	4.20E-07	4.41E-07	2.14E-08
Cadmium	2.20E-05	2.40E-05	1.96E-06
Chromium Compounds	1.10E-03	1.10E-03	2.50E-06
Chromium +6	2.10E-05	2.10E-05	0.00E+00
Cobalt Compounds	6.50E-05	6.52E-05	1.50E-07
Dichlorobenzene	2.40E-05	2.61E-05	2.14E-06
Ethylbenzene	8.40E-01	8.40E-01	0.00E+00
Formaldehyde	1.50E-03	1.63E-03	1.34E-04
Hexane	3.70E-02	4.02E-02	3.22E-03
Lead	1.00E-05	1.00E-05	0.00E+00
Manganese	2.40E-02	2.40E-02	6.79E-07
Methyl isobutyl ketone	3.30E-01	3.30E-01	0.00E+00
Mercury	5.30E-06	5.76E-06	4.64E-07
Naphthalene	1.20E-05	1.31E-05	1.09E-06
Nickel Compounds	4.80E-04	4.84E-04	3.75E-06
Polycyclic Organic Matter	2.30E-07	2.31E-06	2.08E-06
Selenium	4.90E-07	5.33E-07	4.29E-08
Toluene	4.90E-02	4.90E-02	6.07E-06
Xylene	1.00E+00	1.00E+00	0.00E+00
Totals	2.28E+00	2.29E+00	3.37E-03

1. Based on IDEQ Statement of Basis June 20, 2020 and Bldg 1 Expansion Heaters unrestricted uncontrolled emission increase.

APPENDIX B – 40 CFR PART 63 SUBPART HHHHHH EXEMPTION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
AIR AND WASTE

JUL 28 2017

Mr. Jerry Whitehead
Western Trailer Company
PO Box 5598
Boise, Idaho 83705-0598

Dear Mr. Whitehead:

This letter is in response to your petition dated October 3, 2016, requesting exemption for the Western Trailer Company from the motor vehicle and mobile equipment surface coating requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at 40 C.F.R. Part 63, Subpart HHHHHH. Your petition request pertains to the facility located at 6701 Business Way, Boise, Idaho.

To obtain an exemption, 40 C.F.R. § 63.11170(a)(2) requires that as the owner or operator of a motor vehicle and mobile equipment surface coating operation you demonstrate, to the U.S. Environmental Protection Agency's satisfaction, that you spray apply no coatings that contain the target hazardous air pollutants (HAP), as defined in 40 C.F.R. § 63.11180. The petition must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP.

Based upon the information you submitted and your signed certification indicating that none of the coatings sprayed at the Western Trailer Company contain the target HAP, the EPA is accepting your petition for exemption from 40 C.F.R. Part 63, Subpart HHHHHH. Please remember that the products described in your petition may contain target HAP. It is important that you carefully follow the manufacturer's directives to avoid the use of target HAP. All target HAP containing coatings must be eliminated from your paint line in order to maintain your exemption.

Please note that other provisions of 40 C.F.R. Part 63 Subpart HHHHHH may still apply to the Western Trailer Company, such as the provisions applicable to paint stripping operations involving the use of chemical strippers containing methylene chloride.

Keep a record of this exemption on site at the Western Trailer Company for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that the facility intends to spray apply coatings containing any target HAP, the owner or operator must submit the initial notification required by 40 C.F.R. § 63.11175 and comply with the requirements of this subpart.

Nothing in this exemption shall be construed as limiting the ability of the EPA or delegated agencies to pursue enforcement action, if it is determined that any of your facilities were not eligible for this exemption or for any other violations under the Clean Air Act. Federal law establishes penalties for providing false information to the EPA. This determination does not relieve Western Trailer Company

of responsibility for complying fully with any and all other applicable federal, state and local laws, regulations and permits.

If you have any questions regarding this response, please contact Madonna Narvaez, of my staff, at (206) 553-2117, or electronically at narvaez.madonna@epa.gov.

Sincerely,



Donald Dossett, Manager
Stationary Source Unit

cc: Mr. Thomas Krinke
Air Quality Science Officer
Idaho Department of Environmental Quality

APPENDIX C – FACILITY DRAFT COMMENTS

On February 22, 2022, the facility stated they have no comments on the draft permit provided to them.

APPENDIX D – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Western Trailer Co.
Address: 6701 Business Way
City: Boise
State: ID
Zip Code: 83716
Facility Contact: Aaron Ricks
Title: Manufacturing Operations Manager
AIRS No.: 001-00337

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.2	0	0.2
SO ₂	0.0	0	0.0
CO	0.2	0	0.2
PM10	0.0	0	0.0
VOC	0.0	0	0.0
Total:	0.0	0	0.4
Fee Due	\$ 1,000.00		

Comments: