Statement of Basis

Permit to Construct No. P-2014.0026
Project ID 62582

Criterion Trailers LLC
Caldwell, Idaho

Facility ID 027-00145

Final

June 14, 2021
Aaron Hoberg
Permit Writer

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.

TABLE OF CONTENTS

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
Btu	British thermal units
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GACT	Generally Available Control Technology
HAP	hazardous air pollutants
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
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
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
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	*Rules for the Control of Air Pollution in Idaho*
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/day	tons per calendar day
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

Criterion Trailers LLC manufactures packaged electrical equipment, generator enclosures and tanks for the power, oil and gas, industrial, mining, water, and renewable energy markets. The facility receives carbon steel, galvanized steel, ancillary parts, electrical components, paints, thinners, welding supplies and equipment support chemicals (e.g. cutting fluids, oils and lubricants). Machining is conducted through the use of shears, breaks, forming machines, and one drill press. Assembly of products is conducted before and after painting operations. Assembly includes adding connections and components. Welding occurs through one of approximately 20 welding stations in the main building. Electrical integration occurs on the approximately 24,000 square foot rectangular shaped concrete pad located along the western property boundary.

Painting operations include application of primer coat, subsequent assembly operations (if necessary), followed by the application of the remaining coats. Painting operations are conducted through the use of air-less spray guns within the paint booth, which is equipped with filtered exhaust vents. Paints are mixed in a dedicated paint mixing room located in the northern portion of the paint drying building. Products are then moved to the paint drying building where the product is left to dry through the use of fans and the heated floors (heated through the use of natural gas fired boiler). If necessary, minor touch up painting operations, using handheld spray guns, are performed in the paint drying booth.

Criterion Trailers LLC conducts the following activities in support of the major operations:

- General building and machinery/equipment maintenance.
- On-site dust suppression activities through the use of water spray application.
- Manufactures aerosol spray cans included as part of a touch-up kit provided to customers.
- Transfer of raw materials and finished products using five propane-powered forklifts, five diesel-powered forklifts, one diesel-powered crane, one diesel-powered bridge crane, and two diesel-fueled pickup trucks.

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).

January 22, 2016	P-2014.0026, the initial permit to construct for an existing steel tank and enclosure facility, Permit status S
November 16, 2018	P-2014.0026, modification of PTC to change name from Koontz-Wagner to Criterion Trailers LLC, Permit status (A, but will become S upon issuance of this permit)

Application Scope

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

The applicant has proposed to:

- Remove sand blasting equipment
- Remove plasma cutting equipment,
- Remove the natural gas fired heater
- Remove the emergency generator
- Remove the fuel tank
- The facility will continue to operate the paint booth, welding equipment, and boiler for heat.

Application Chronology

February 17, 2021	DEQ received an application.
March 19, 2021	DEQ determined that the application was complete.
June 1, 2021	DEQ made available the draft permit and statement of basis for applicant review.
June 9, 2021	DEQ received the permit processing fee.
June 14, 2021	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	Control Equipment
Boiler – 0.15 MMBtu/hr Natural Gas Fired	None
Welding Operations – various equipment	3 or more sided enclosure
Spray Painting Operations	Booths with filters

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.

There are no new or revised emissions at the site due to this permit action. The sources that were removed from the permit have had their respective potential to emit removed as well. This resulted in a net decrease in the potential to emit for all pollutants.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined 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 not be treated as part of its design since the limitation or the effect it would have on emissions is not state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for criteria air pollutants and carbon dioxide equivalent emissions as determined by DEQ staff using the applicant's calculations but removing emissions reductions attributed to air pollution control devices and by increasing painting operations to the presumed maximum potential operations equivalent to 8,760 hours per year instead of 2,730 hours per year (that is, painting emissions were increased by a factor of 3.2).

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Permitted Sources						
Boiler	0.005	0.005	4E-4	0.064	0.054	4E-3
Welding	0.03	0.03	-	-	-	-
Painting	2.75	0.98	-	-	-	65.49
Total, Permitted Sources	**2.785**	**1.015**	**0.0004**	**0.064**	**0.054**	**65.494**

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 from the last permitting action.

Table 3 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Permitted Sources						
Generator	0.012	0.012	5E-4	0.4	0.22	0.03
Boiler	0.005	0.005	4E-4	0.064	0.054	4E-3
Heater	9.4E-3	9.4E-3	7.42E-4	0.124	0.104	6.8E-3
Welding	0.01	0.01	-	-	-	-
Blasting	0.59	0.06	-	-	-	-
Plasma Cutting	1.6E-3	1.6E-3	-	-	-	-
Painting	0.86	0.31	-	-	-	20.49
Total, Permitted Sources	**1.49**	**0.40**	**0.002**	**0.59**	**0.38**	**20.52**

Post Project/Controlled 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 and carbon dioxide equivalent pollutants from all emissions units at the facility as determined by the applicant and reviewed by DEQ staff.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM_{10}	$PM_{2.5}$	SO_2	NOx	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Permitted Sources						
Boiler	0.005	0.005	4E-4	0.064	0.054	4E-3
Welding	0.01	0.01	-	-	-	-
Painting	0.86	0.31	-	-	-	20.49
Total, Permitted Sources	**0.875**	**0.325**	**0.0004**	**0.064**	**0.054**	**20.49**

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
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Pre-Project Potential to Emit	1.49	0.40	0.002	0.59	0.38	20.52
Post Project Potential to Emit	0.875	0.325	0.0004	0.064	0.054	20.49
Changes in Potential to Emit	**-0.615**	**-0.075**	**-0.0016**	**-0.526**	**-0.326**	**-0.03**

TAP Emissions

The permit limits daily toxic air pollutant emissions so they do not exceed the EL (lb/hr) multiplied by 24 (for TAPs listed in both IDAPA 58.01.01.585 and 586), or limits emissions such that they do not exceed the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585) and the acceptable ambient concentration for carcinogens ($\mu g/m^3$) (for TAPs listed in IDAPA 58.01.01.586).

The permit requires keeping records of emissions daily and annually, reporting whenever a modeling exercise is conducted to show that impacts are below acceptable ambient concentrations.

These permit conditions are consistent with permit conditions that have been issued to Charmac Trailers[1] and Guerdon Enterprises[2]. The applicant requested that they be issued these types of permit conditions on the initial permit and there have been no changes since.

Criterion Trailers LLC's initial permit application included an emission inventory for the suite of paints and solvents listed in the application. The only TAP that exceeded screening emissions levels was naphthalene. Criterion Trailers LLC has modeled the emission rates of naphthalene (7.52E-4 lb/hr) and determined that ambient impacts are below the acceptable concentrations listed in Section 585 and 586 of the Rules. The permit requires that Criterion Trailers LLC estimate emissions of TAPs each day. If emissions exceed the screening emissions levels they shall conduct a modeling analysis to assure compliance with acceptable ambient concentrations. If modeling is conducted, an annual report shall be submitted to DEQ by May 1st of each year.

HAP Emissions

Facility-wide HAP emissions are limited by the permit to be less than 10 tons per any consecutive 12 month period for any individual HAP, and to less than 25 tons per any consecutive 12 month period for all HAPs combined. The facility shall keep records and demonstrate monthly that emissions are below these limits.

1 Charmac Trailers, PTC P-2009.0095 issued January 6, 2010
2 Guerdon Enterprises, LLC, PTC P-201.0018 issued September 2, 2014

The facility's initial potential to emit calculations provided that xylene emissions were above the HAP 10 ton per year major facility threshold (10.5 tons per year during 2,730 hour of operation). However, Criterion Trailers LLC updated the application to reflect that the facility does not currently use xylene for cleanup operations. Without using xylene for cleanup, potential xylene emissions were then reported to be below 10 tons per year (7.47 tons per year).

Actual emissions of xylene from the previous owner during 2012, while using xylene for cleanup, are reported to be 8.2 tons per year during 2,730 hours of operation. In determining the uncontrolled potential to emit DEQ presumes that the Criterion Trailers LLC facility could operate at least 3,330 hours per year while using xylene for cleaning as they had in the past[3]. This would result in potential xylene emissions greater than or equal to 10 tons per year. Therefore a permit limit is necessary to limit HAP emissions below major facility thresholds.

All emission inventories provided by Criterion Trailers LLC were based on 2012 actual emission data indicating the facility's basic purpose and operations remain the same. The only notable exception is that current operations do not use xylene for cleanup.

Ambient Air Quality Impact Analyses

The applicant has demonstrated pre-construction compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP).

An ambient air quality impact analyses was not required for this permitting action because there was a net decrease in all criteria pollutants.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County, which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

A = Use when any one HAP has actual or potential emissions $\geq$ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions $\geq$ 25 T/yr.

SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits $\geq$ 8 T/yr of a single HAP or $\geq$ 20 T/yr of THAP.

SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.

B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

UNK = Class is unknown.

3 After purchasing the facility, Criterion Trailers LLC states they used xylene for cleaning but currently they don't. Consequently the uncontrolled potential to emit reflects the use of xylene for cleaning even though the facility does not currently use it for that purpose.

For All Other Pollutants:

A = Actual or potential emissions of a pollutant are ≥ 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.

B = Actual and potential emissions are < 100 T/yr without permit restrictions.

UNK = Class is unknown.

Table 5 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	3.97	1.24	100	B
$PM_{10}/PM_{2.5}$	2.79/1.02	0.875/0.325	100	B
SO_2	0.0004	0.0004	100	B
NO_x	0.064	0.064	100	B
CO	0.054	0.054	100	B
VOC	65.74	20.524	100	B
HAP (single)	7.54	2.35	10	B
HAP (Total)	13.41	4.18	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 existing and operating source. Since the source has demonstrated to DEQ's satisfaction that it would comply with state and federal standards 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.

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 permitted emissions from this facility do not have a potential to emit greater than 100 tons per year for criteria pollutants, or 10 tons per year for any one HAP or 25 tons per year for all HAP combined. Therefore, as permitted, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006.122.

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 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)

40 CFR 60, Subpart Dc ..... Standards of Performance for Small Industrial–Commercial–Institutional Steam Generating Units

§ 60.40c ..... Applicability

Section (a) specifies that except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). Criterion Trailers LLC's boiler is rated at 0.15 MMBtu/hr which is less than the applicability threshold and this standard does not apply.

NESHAP Applicability (40 CFR 61)

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

MACT/GACT Applicability (40 CFR 63)

Because the facility uses spray coating, it may be subject to the requirements of 40 CFR Part 63, Subpart XXXXXX – Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The following breakdown provided by the applicant demonstrates that they are not subject to this Subpart.

40 CFR 63, Subpart XXXXXX..... National Emission Standards for Nine Metal Fabrication and Finishing Source Categories

§63.11514 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"

(1) Electrical and Electronic Equipment Finishing Operations;

(2) Fabricated Metal Products;

(3) Fabricated Plate Work (Boiler Shops);

(4) Fabricated Structural Metal Manufacturing;

(5) Heating Equipment, except Electric;

(6) Industrial Machinery and Equipment Finishing Operations;

(7) Iron and Steel Forging;

(8) Primary Metal Products Manufacturing; and

(9) Valves and Pipe Fittings.

As permitted, Criterion Trailers LLC is an area source of HAP, however according to the application it is not primarily engaged in one of the nine listed categories. The Criterion Trailers LLC facility designs and manufactures packaged electrical equipment, generator enclosures and tanks for the power, oil and gas, industrial, mining, water, and renewable energy markets. The facility conducts operations identified by the primary SIC code is 3448, Prefabricated Metal Buildings and Components. The corresponding NAICS code is 332311, Prefabricated Metal Building and Component Manufacturing.

EPA has published applicability guidance in a "Questions & Answers"[4] format. In this guidance EPA states that in order to be an affected source the facility must be primarily engaged in the specifically listed SIC and NAICS codes. Both SIC and NAICS codes must apply in order to meet the applicability criteria. That EPA list of codes is provided below.

	EPA Source Category	SIC Code Description	SIC Code	NAICS Code	NAICS Description
1	Electrical & Electronic Equipment Finishing Ops	Motors and Generators Manufacturing	3621	335312	Motor and Generator Manufacturing
		Electrical Machinery, Equipment, & Supplies, NEC	3699	335999	All Other Misc. Electrical Equipment & Component Mftg
2	Fabricated Metal Products, NEC	Fabricated Metal Products, NEC	3499	332117	Powder Metallurgy Part Manufacturing
		Fabricated Metal Products, NEC	3499	332999	All Other Miscellaneous Fabricated Metal Product Mftg
3	Fabricated Plate Work (Boiler Shops)	Fabricated Plate Work and Boiler Shops	3443	332313	Plate Work Manufacturing
		Fabricated Plate Work and Boiler Shops	3443	332410	Power Boiler and Heat Exchanger Manufacturing
		Fabricated Plate Work and Boiler Shops	3443	332420	Metal Tank (Heavy Gauge) Manufacturing
4	Fabricated Structural Metal Manufacturing	Fabricated Structural Metal Fabrication	3441	332312	Fabricated Structural Metal Manufacturing
5	Heating Equipment, except electric	Heating Equipment, except electric	3433	333414	Heating Equipment (except Warm Air Furnaces) Mftg
6	Industrial Machinery & Equipment: Finishing Ops	Construction Machinery Manufacturing	3531	333120	Construction Machinery Manufacturing
		Oil and Gas Field Machinery Equipment Mftng	3533	333132	Oil and Gas Field Machinery and Equipment Mftg
		Pumps and Pumping Equipment Mftng	3561	333911	Pump and Pumping Equipment Manufacturing
7	Iron and Steel Forging	Iron and Steel Forging	3462	332111	Iron and Steel Forging
8	Primary Metals Products Manufacturing	Primary Metals Products Manufacturing	3399	332618	Other Fabricated Wire Product Manufacturing
9	Valves and Pipe Fittings, NEC	Valves and Pipe Fittings, NEC	3494	332919	Other Metal Valve and Pipe Fitting Manufacturing

As previously described, Criterion Trailers LLC has certified that it is primarily engaged in SIC code 3448 and NAICS code 332311. Neither of these codes is specifically listed and the source is not an affected facility.

Permit Conditions Review

This section describes the permit conditions for this initial.

Permit Condition 1.1

This condition describes the permits scope. Criterion Trailers LLC is an existing and operating source. Criterion Trailers LLC submitted an application to remove equipment from the permit to construct (PTC) an existing. The facility operates a prefabricated metal building, component manufacturing, and manufactures steel tanks. Operations include metal working, welding and painting. The facility receives various forms of steel, and machines the steel into tanks and enclosures.

Table 1.1

Table 1.1 lists the emission units at the facility along with any associated air pollution control equipment. The natural gas fired heater, abrasive blasting, plasma cutting, diesel generator, and gasoline tank were removed from the list of emission units.

Permit Condition 2.1

Section 2 of the permit limits toxic air pollutant and hazardous air pollutant emissions.

This permit condition describes the manufacturing operations at the facility. The heater, blasting, plasma cutting, and generator were removed from this condition.

Permit Condition 2.2

This permit condition describes the air pollution equipment operated at the source. Blasting and plasma cutting were removed from this condition.

4 http://www.epa.gov/ttn/atw/6x/metal_fabrication_q_a_nov-2011-rev3.pdf

Permit Condition 2.3

This permit condition limits daily TAP emissions rates to below the screening emission level multiplied by 24 for TAPs listed in Section 585 and for the TAPs listed in Section 586 of the rules, or below the emission rate that would cause an ambient impact to exceed the acceptable ambient concentration for that TAP. Daily emissions of equal to or less than the EL times 24 assures that maximum 24-hour average emissions rates are below the EL for TAPs listed in Section 585 and 586 of the Rules. If daily emissions exceed the EL times 24 then the facility shall model emission rates to determine ambient impacts. Under this permit condition TAP ambient impacts are limited from the facility to be less than the acceptable ambient concentration. The permit does allow the use of new paints and solvents provided those changes result in emissions that comply with the above described permit conditions. Metal fabrication, the generator, and the heater were removed from this condition.

Requiring modeling to assure compliance with acceptable ambient concentrations is consistent with the toxic air pollutant exemption criteria listed in Section 223.02.b[5] of the Rules and consistent with the precedent set by the Charmac Permit to Construct (P-2009.0095) that was issued on January 6, 2010 and the Guerdon Enterprises Permit to Construct (P-2014.0018) that was issued September 2, 2014.

Permit Condition 2.4

Hazardous Air Pollutant (HAP) emissions are limited below major facility thresholds.

Permit Condition 2.5

Particulate matter emissions from welding operations shall be controlled by operating in a 3 or more sided enclosure. This is consistent with the emission inventory provided in the application. Blasting and plasma cutting were removed from this condition.

Permit Condition 2.6

Particulate matter emissions from all spray painting operations are controlled by conducting operations within booths equipped with filters guaranteed by the manufacture to remove at least 95.56% of the particulate matter emitted from spray painting operations. This is consistent with the emission inventory provided in the application.

Permit Condition 2.7

This permit condition was previously for blasting material usage and has been removed with the removal of blasting operations. All following conditions in this section have been renumbered. This condition is now for limiting paint usage to 22,000 gallons per year. This is consistent with the emission inventory provided in the application. This condition serves to limit VOC emissions and particulate matter emissions. VOC emissions are limited to below the major facility threshold of 100 tons per year and particulate matter emissions are limited below the modeling threshold discussed in the modeling section of this statement of basis. For the suite of paints included in the application VOC emissions are estimated to be 20.5 tons per year. PM_{10} emissions from painting operations are estimated to be 0.86 tons per year and when combined with all other sources of emissions at the facility are less than the 1.5 ton per year modeling threshold. $PM_{2.5}$ emissions from painting operations are estimated to be 0.31 tons per year and when combined with all other sources of emissions at the facility are less than the 1.0 ton per year modeling threshold.

Permit Condition 2.8

This permit condition requires keeping records of the daily usage of HAP and TAP containing materials that emit air pollution. This information will be used to estimate emissions as required by Permit Condition 2.09 and 2.10. Monitoring requirements for the blasting material was removed from this condition.

5 The toxic air pollutant exemption criteria are not applicable to this permit condition but it is relevant in the sense that this permit condition requires similar reporting requirements when air pollution dispersion modeling is conducted.

Permit Condition 2.9

This permit condition requires the permittee to calculate and record TAP emissions each day. If the daily emissions (pounds per calendar day) exceed the TAP screening emissions multiplied by 24 then the source must model to determine ambient impacts. In accordance with the general provisions all emissions calculations shall remain on-site. If modeling is conducted a report must be submitted to DEQ by May 1 each year as required by Permit Condition 2.12.

Permit Condition 2.10

Each month the permittee shall determine the HAP emissions that occurred during the previous 12 consecutive months. The permittee shall determine the emissions of each individual HAP and the total of all HAP emissions combined. As discussed in the HAP Emissions section of this statement of basis, the facility has the potential to emit HAP at rates greater than the major facility thresholds and monitoring to assure emissions do not exceed major facility thresholds is warranted. In accordance with the general provisions all emissions calculations shall remain on-site.

Permit Condition 2.11

Consistent with the emission calculations provided in the application all particulate matter emissions from spray painting operations shall be controlled by a filter certified by the manufacturer to remove 95.56% or greater of the particulate matter emitted from spray painting operations.

Permit Condition 2.12

Each year the permittee shall submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall include all modeling files and emissions calculations.

Permit Condition 2.13

This permit condition serves to remind the source that it has an obligation to submit an excess emissions report should modeling show that an acceptable ambient concentration for any TAP was violated.

Section 3 of the previous permit was for the Emergency Generator. Section 4 of the previous permit was for the Gasoline Dispensing Tank. Since both of these units were removed in this permit action, the sections have been removed and Section 3 is now the General Provisions.

PUBLIC REVIEW

Public Comment Opportunity

Since the permit action was to remove equipment from the permit, an opportunity for public comment period on the application was not required.

APPENDIX A – 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:	**Criterion Trailers LLC**
Address:	**20934 Pinto Lane**
City:	**Caldwell**
State:	**Idaho**
Zip Code:	**83607**
Facility Contact:	**Ray White**
Title:	**Co Owner**
AIRS No.:	**027-00145**

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	0.0	0.526	-0.5
SO_2	0.0	0.0016	0.0
CO	0.0	0.326	-0.3
PM10	0.0	0.615	-0.6
VOC	0.0	0.036	0.0
Total:	0.0	1.5046	**-1.5**
Fee Due	**$ 1,000.00**		

Comments: Removal of equipment with a net reduction on emissions.