Statement of Basis

Permit to Construct No. P-2016.0058
Project ID 62418

Western Trailer Co.
Boise, Idaho

Facility ID 001-00337

Final

June 29, 2020
Chris Duerschner
Permit Writer

CD

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

Btu	British thermal units
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
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
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
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
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds

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 Permit status is noted as active and in effect (A) or superseded (S).

January 16, 2019	P-2016.0058, PTC modification to increase permitted welding material usage and decrease permitted natural gas usage, Permit status (A, but will become S upon issuance of this permit)
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 increase the aluminum use limit at Building 1 from 2,614 pounds of aluminum wire per year (lb/yr) to 6,164 lb/yr.

Application Chronology

April 3, 2020	DEQ received an application and an application fee.
April 8 – April 23, 2020	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
April 23, 2020	DEQ determined that the application was complete.
May 28, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 8, 2020	DEQ made available the draft permit and statement of basis for applicant review.
June 25, 2020	DEQ received the permit processing fee.
June 29, 2020	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	MAU1 Paint Shop Dry Heater: Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat input rating: 1.5 MMBtu/hr Fuel: Natural Gas	None	Paint R1
MAU2	MAU2 Paint Shop Wash Bay Heater: Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat Input Rating: 1.5 MMBtu/hr Fuel: Natural Gas	None	Paint R2
MAU3	MAU3 Paint Booth Heaters: Manufacturer: Viking Model: ANSZ83.4 (2) Manufacture Date: 1998 Heat Input Rating: 5.6 MMBTU/hr Fuel: Natural Gas	None	Paint V1-6
H1	H1 Building 1 Space Heater: Manufacturer: Reznor Model: FT-30 Manufacture Date: 1998 Heat Input Rating: 0.3 MMBTU/hr Fuel: Natural Gas	None	BLD1D6
H2	H2 Building 1 Unit Heaters: 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	H3 Building 1 Tool Room Furnace: Manufacturer: Bryant Model: Indirect-Fired Manufacture Date: 1998 Rating: 0.046 MMBTU/hr Fuel: Natural Gas	None	BLD1 D7
H4	H4 Building 1 Office Furnaces: 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	H5 Building 8 Unit Heaters: 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
H6	H6 Building 8 Training Room Furnace: Manufacturer: Trane Model: TUE100A948K2 Manufacture Date: 1999 Heat Input Rating: 0.10 MMBTU/hr Fuel: Natural Gas	None	BLD8 D4
H7	H7 Building 10 Welding Area Unit Heaters: Manufacturer: RE-VERBER-RAY	None	BLD10 doors and vents

	Model: DR100 Manufacture Date: 1998 (8) Heat Input Rating: 0.8 MMBTU/hr total Fuel: Natural Gas		
H8	H8 Building 10 Machine Shop Area Unit Heaters: Manufacturer: Modine Model: PDP125AED130 Manufacture Date: 2005 (3) Heat Input Rating: 0.375 MMBTU/hr total Fuel: Natural Gas	None	BLD10 D2-D4
H9	H9 Building 10 Office Furnaces: 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	H10 Blast Building Heaters: Manufacturer: Reznor Model: UDAS-300 Manufacture Date: 1998 (2) Heat Input Rating: 0.60 MMBTU/hr total Fuel: Natural Gas	None	BLST1-2
MB1	MB1 Media Blast: Manufacturer: CLEMCO Model: 3661 Manufacture Date: 1998 Max. Capacity: 10 ft^3	F1 Filter: Manufacturer: CAMFILL FARR Model: GS-20 Filter efficiency: 99.7%	F1 exhaust
	Welders (84): Manufacturer: Lincoln, Miller, Hypermax Types: Mig/Tig, GMAW, SMAW, plasma Manufactured: 1998-2014	None	BLD1,8,10 vents and doors
R1	R1 Multicam Router: Manufacturer: Multicam Model: 5500 Manufacture Date: 1998	T1 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: GS20 Filter Efficiency: 99.9%	T1 exhaust
R2	R2 Komo Router: Manufacturer: Komo Model: M2 512S SHO Manufacture Date: 1998	T2 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: DFT 3-18 Filter Efficiency: 99.9%	T2 exhaust
S1	S1 Aluminum Saw: Manufacturer: SOCO Model: M2MC-260N/FA Manufacture Date: 1998	T3 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: GS20-5 Filter Efficiency: 99.9%	T3 exhaust
D1	D1 Deburring Machines (2): Manufacturer: COSTA Model: MD4CVC1150 Manufacture Date: 2015/2016 Max. Capacity: approx. 10,000 lb/day	T4 Downflow II: Manufacturer: Donaldson Torit Model: DFT 3-18 Filter Efficiency: 95%	T4 exhaust
PB	Paint Booth: Type: Side Draft Manufacture Date: 1998	Spray Guns: Graco G-40 air assisted airless HVLP Transfer Efficiency: 85% Graco PRO XP Electrostatic Transfer Efficiency: 85% Filter: UltraII/Ultra Filter Efficiency: 99.90% combined	Paint V1-6
SR1	SR1 Solvent Recycling: 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 use of aluminum welding wire in Building 1 (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission factors included in the San Diego Air Pollution Control District Welding Operations Guidance and the fume correction factors supplied by NASSCO (National Steel and Shipbuilding Company), operation of 4,800 hours per year, and process information specific to the facility for this proposed project.

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. The pre-project PTE for criteria pollutants was taken from the SOB for P-2016.0028 issued March 16, 2017 (Project 61796). Although there are more recent statements of basis for permit P-2016.0028, none of their corresponding projects permit an operational change at the facility; therefore, the original PTE is retained as the baseline emission rate.

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	13.942	29.00
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	0.199	0.414	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	**0.45**	**0.97**	**0.01**	**0.02**	**1.57**	**3.62**	**1.32**	**3.05**	**14.04**	**29.22**

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	13.942	29.00
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
Post Project Totals	**0.48**	**0.99**	**0.01**	**0.02**	**1.57**	**3.62**	**1.32**	**3.05**	**14.04**	**29.22**

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	0.45	0.97	0.01	0.02	1.57	3.62	1.32	3.05	14.04	29.22
Post Project Potential to Emit	0.48	0.99	0.01	0.02	1.57	3.62	1.32	3.05	14.04	29..22
Changes in Potential to Emit	**0.03**	**0.02**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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)
Fe – fume	1.53E-03	1.53E-03	4.04E-05	3.33E-01	No
Mg – fume	6.64E-04	9.06E-04	2.42E-04	3.33E-01	No
Mn – fume	8.61E-03	8.69E-03	8.08E-05	6.70E-02	No
Al	1.53E-02	4.03E-02	4.03E-03	6.67E-01	No
Cr	4.68E-04	4.87E-04	1.92E-05	3.30E-02	No
Silicon	6.11E-03	6.68E-03	5.66E-04	6.67E-01	No
Cu – fume	4.06E-03	4.08E-03	2.02E-05	1.30E-02	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)
Nickel	2.80E-05	2.91E-05	1.11E-06	2.7E-05	No
Beryllium	1.30E-07	1.37E-07	6.64E-09	2.8E-05	No
Cr^{+6}	1.44E-06	1.99E-06	5.54E-07	5.6E-07	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 (lb/hr)	PTE (T/yr)
Arsenic	9.36E-07	4.1E-06
Benzene	9.82E-06	4.3E-05
Beryllium	9.59E-08	4.2E-07
Cadmium	5.02E-06	2.2E-05
Chromium Compounds	2.62E-04	1.1E-03
Chromium +6	4.89E-06	2.1E-05
Cobalt Compounds	1.48E-05	6.5E-05
Dichlorobenzene	5.48E-06	2.4E-05
Ethylbenzene	1.92E-01	8.4E-01
Formaldehyde	3.42E-04	1.5E-03
Hexane	8.45E-03	3.7E-02
Lead	2.28E-06	1.0E-05
Manganese	5.52E-03	2.4E-02
Methyl isobutyl ketone	7.53E-02	3.3E-01
Mercury	1.21E-06	5.3E-06
Naphthalene	2.74E-06	1.2E-05
Nickel Compounds	1.11E-04	4.8E-04
Polycyclic Organic Matter	5.25E-08	2.3E-07
Selenium	1.12E-07	4.9E-07
Toluene	1.12E-02	4.9E-02
Xylene	2.28E-01	1.0E+00
Totals	**0.52**	**2.28**

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 $PM_{2.5}$, PM_{10}, 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 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	306	0.99	**100**	SM
PM_{10}	306	0.99	**100**	SM
$PM_{2.5}$	306	0.99	**100**	SM
SO_2	0.04	0.02	**100**	B
NO_X	7.16	3.62	**100**	B
CO	6.01	3.05	**100**	B
VOC	51.35	29.22	**100**	B
HAP (single)	2.1	1.00	**10**	B
Total HAPs	4.67	2.28	**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 proposed change in permitted material usage. 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 PM_{10}, SO_2, NO_X, CO, VOC, and HAP 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 in 40 CFR 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 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. But, this subpart will apply unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2). See SOB for P-2016.0058 issued March 16, 2016, for a complete breakdown of this subpart as it applies to this facility. Permit conditions 5.14 through 5.18 ensures regulation in accordance with this subpart. DEQ is delegated this Subpart. Refer to the Title V Classification section for additional information.

Permit Conditions Review

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

Existing Permit Condition 4.4

Permit Condition 4.4 (Welding Material Usage Limit) was modified to increase the maximum permitted amount of aluminum welding electrode in Building 1 from 2,614 to 6,164 pounds per year.

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
6701 Supply Way, Boise, ID 83716

Table 3-1 Building 1 Aluminum Welding Emissions Increase

Building 1 Welding Material	**TAP/HAP Metal**	**Al**	**Be**	**Cr**	**Cr+6**	**Cu**	**Co**	**Fe**	**Mg**	**Mn**	**Molyb**	**Ni**	**P**	**Silicon**	**Titanium**	**Zn**
Welding Process/Electrode	CAS No.	7429-90-5	7440-41-7	7440-47-3	18540-29-9	7440 50 8	7440-48-4	7439 89 6	7439 96 5	7439 96 5	7439 98 7	7440 02 0	7723-14-0	7440 21 3		7440-66-6
Aluminum Fillers	**Annual Use (lbs.**	**Al**	**Be**	**Cr**	**Cr+6**	**Cu**	**Co**	**Fe**	**Mg**	**Mn**	**Molyb**	**Ni**	**P**	**Silicon**	**Titanium**	**Zn**
[4]GMAW Mig/Tig Hobart Maxal 5356	3,550	99.7%	<0.0003%	0.50%		0.5%		1%	6%	2%		0.05%		14%		
Subtotal Aluminum Wire lbs.	3,550															
Metal	**PM10 total**	**Al**	**Be**	**Cr**	**Cr+6**	**Cu**	**Co**	**Fe**	**Mg**	**Mn**	**Molyb**	**Ni**	**P**	**Silicon**	**Titanium**	**Zn**
TAP		**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**		**X**
HAP			**X**	**X**	**X**		**X**			**X**		**X**				
Table 12.19-1 and SDAPCD w/NASSCO fume correction				X	X		X			X		X				
Table 12.19-2 and SDAPCD w/NASSCO fume correction				X	X		X			X		X				
SDAPCD w/ GMAW/SMAW NASSCO fume correction		X	X	X	X	X	X	X	X	X	X	X	**X**	X	X	X
SDAPCD Unspecified Process		X	X	X	X	X	X	X	X	X	X	X	**X**	X	X	X
IDEQ EL Dust (lbs./hr.)	---	6.7E-01	2.80E-05	3.3E-02	5.6E-07	6.7E-02	3.30E-03	---	---	3.3E-01	6.7E-01	2.70E-05	7.00E-03	6.7E-01	---	6.7E-01
Fume lbs/yr	1.9E+01	1.9E+01	5.8E-05	9.2E-02	4.8E-03	9.7E-02	0.0E+00	1.9E-01	1.2E+00	3.9E-01	0.0E+00	9.7E-03	0.0E+00	2.7E+00	0.0E+00	0.0E+00
(Assume use in 4 days/week, 50 weeks/yr=200 days/yr; 24 hour average/day; (if 5 days occasionally the value would be lower) Fume (lbs/hr)	4.04E-03	4.0E-03	6.6E-09	1.9E-05	5.54E-07	2.02E-05	0.00E+00	4.04E-05	2.42E-04	8.08E-05	0.0E+00	1.11E-06	0.0E+00	5.7E-04	0.0E+00	0.0E+00
IDEQ EL Fume (lbs./hr.)		---	---	---	---	1.3E-02	3.30E-03	3.33E-03	0.667	0.667%	---	---		---	---	3.330E-01
		0.6%	0%	0.06%	98.9%	0%	0.0%	1.2%	0%	0%	0%	4%	0%	0%	NA	0%
		< TAP EL	> TAP EL													

NOTES

[1]Welding Wire Use amounts based on 200 days/year (4 days/week, 50 weeks/year).

[2]Calculation Method Without AP-42 Emission Factors: SDAPCD G99 Gas Metal Arc Weldging (GMAW), Unspecified Electrode, General District-ARB-NASSCO GMAW Emission Estimation Procedure.
Eh = max hourly emissions of each TAP Ea= annual emissions of each TAP
Ea= Ua X EF (fume rate rod lbs fume/lbs rod) X Nasso fume Correction Factor X Concentration metal
Eh=Uh X EF (fume rate rod lbs fume/lbs rod) X Nasso fume Correction Factor X Concentration metal

Welding Process	lbs fume/lbs rod
default fume rates GMAW, MIG, TIG	1%
default fume rates SMAW, FCAW	2%
default fume rates unspecified	5%
default fume Correction Factor GMAW, MIG, TIG	0.5464
default fume Correction Factor SMAW, FCAW	0.2865
default fume Correction Factor unspecified	1.0
default Cr+6 conversion rates GMAW, MIG, TIG	0.05
default Cr+6 conversion rates SMAW, FCAW	0.63
default Cr+6 conversion rates unspecified	0.1
default emission factor (lbs./lbs rod)	
PM10 (PM2.5)	0.01
Cr+3	0.01*0.5464*.95*CI
Cr+6	0.01*0.5464*.05*CI
Cobalt	0.01*0.5464*CI
Manganese	0.01*0.5464*CI
Nickel	0.01*0.5464*CI
Lead	0.01*0.5464*CI
Metals w/o EF	0.01*0.5464*CI

Tables 4-1a to 4-1c
Facility-Wide Unrestricted Uncontrolled
NSR Regulated Pollutant Emissions

Table 4-1a: Pre-Project Unrestricted Potential to Emit (based on SOB Table 2, Poat Project Potential to Emit[1])

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases CO2e	HAPs
	tons/yr								
Welding	0.421	0.421							
Total	0.42	0.42	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Table 4-1b: Post-Project Unrestricted Potential to Emit (based on maximum unrestricted/uncontrolled operations[2])

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases CO2e	HAPs
	tons/yr								
Welding	0.442	0.442	0	0	0	0	0	0	0
Total	0.4	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Table 4-1c: Changes in Unrestricted Potential to Emit (based on maximum unrestricted/uncontrolled operations)

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases CO2e	HAPs
	tons/yr								
Welding	0.02	0.02	0	0	0	0	0	0	0
Total	0.02	0.02	0	0	0	0	0	0	0

Western Trailer
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Tables 4-2a to 4-2c
Facility-Wide Restricted Controlled
NSR Regulated Pollutant Emissions

Table 4-2a: Pre-Project Potential to Emit (based on SOB Table 4[1])

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases	HAPs
	tons/yr								
Paint Buiding MAU1	0.025	0.025	0.002	0.322	0.271	0.018	0		
Paint Buiding MAU2	0.025	0.025	0.002	0.322	0.271	0.018	0		
Paint Buiding MAU3	0.105	0.105	0.008	1.38	1.16	0.076	0		
Blast Building Heaters	0.010	0.010	0.001	0.129	0.108	0.007	0		
Building 1 Heater 1	0.000	0.000	0	0.006	0.005	0	0		
Building 1 Heater 2	0.082	0.082	0.006	1.07	0.902	0.059	0		
Buildings Heaters (sic)	0.007	0.007	0.001	0.09	0.076	0.005	0		
Building 10 Heaters	0.017	0.017	0.002	0.278	0.234	0.015	0		
Building 8 Training Rm Heater	0.002	0.002	0	0.022	0.018	0.001	0		
Paint Spray Booth	0.008	0.008	0	0	0	29.00	0		
Solvent Recycling	0.000	0.000	0	0	0	0.02	0		
Media Blasting Blast Bldg.	0.277	0.277	0	0	0	0	0		
Welding	0.421	0.421	0	0	0	0	0	0	
Metal Cutting Bldg 1	0.001	0.001	0	0	0	0	0	0	
Metal Cutting Bldg 10	0.000	0.000	0	0	0	0	0	0	
Metal Deburring Bldg 1	0.000	0.000	0	0	0	0	0	0	
Total	0.98	0.98	0.02	3.62	3.05	29.22	0	0	0

Table 4-2b: Post-Project Potential to Emit (based on proposed material use)

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases	HAPs
	tons/yr								
Paint Buiding MAU1	0.025	0.025	0.002	0.322	0.271	0.018	0	0	0
Paint Buiding MAU2	0.025	0.025	0.002	0.322	0.271	0.018	0	0	0
Paint Buiding MAU3	0.105	0.105	0.008	1.38	1.16	0.076	0	0	0
Blast Building Heaters	0.010	0.010	0.001	0.129	0.108	0.007	0	0	0
Building 1 Heater 1	0.000	0.000	0.000	0.006	0.005	0	0	0	0
Building 1 Heater 2	0.082	0.082	0.006	1.07	0.902	0.059	0	0	0
Buildings Heaters (sic)	0.007	0.007	0.001	0.09	0.076	0.005	0	0	0
Building 10 Heaters	0.017	0.017	0.002	0.278	0.234	0.015	0	0	0
Building 8 Training Rm Heater	0.002	0.002	0.000	0.022	0.018	0.001	0	0	0
Paint Spray Booth	0.008	0.008	0.000	0	0	29	0	0	0
Solvent Recycling	0.000	0.000	0.000	0	0	0.02	0	0	0
Media Blasting Blast Bldg.	0.277	0.277	0.000	0	0	0	0	0	0
Welding	0.431	0.431	0.000	0	0	0	0	0	0
Metal Cutting Bldg 1	0.001	0.001	0.000	0	0	0	0	0	0
Metal Cutting Bldg 10	0.000	0.000	0.000	0	0	0	0	0	0
Metal Deburring Bldg 1	0.000	0.000	0.000	0	0	0	0	0	0
Total	0.990	0.99	0.02	3.62	3.05	29.22	0.00	0.00	0.00

Table 4-2c: Changes in Potential to Emit (based on proposed material use)

Emissions Unit	$PM_{2.5}$	PM_{10}	SO_2	NO_2	CO	VOC	Lead	Greenhouse Gases	HAPs
	tons/yr								
Paint Buiding MAU1	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Paint Buiding MAU2	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Paint Buiding MAU3	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Blast Building Heaters	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Building 1 Heater 1	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Building 1 Heater 2	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Buildings Heaters (sic)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Building 10 Heaters	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Building 8 Training Rm Heater	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Paint Spray Booth	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Solvent Recycling	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Media Blasting Blast Bldg.	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Welding	0.010	0.010	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Metal Cutting Bldg 1	0.000	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
Metal Deburring Bldg 1	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Notes:

1. Pre-Project Potential to Emit from: IDEQ,Tom Burnham, Permit Writer, Statement of Basis, Permit to Construct No. P-2016.0058, Project ID 61796 and modified by Welding in Statement of Basis, Permit to Construct No. P-2016.0058, Project ID 62090. Western Trailer Co., Boise, Idaho, Facility ID 001-0037, Table 2, September 20, 2018.

Table 4-3: Facility-Wide Regulated Criteria Pollutant Emissions Increases

Criteria Air Pollutants	PTE Emissions Increases		Significance Threshold		Below Regulatory Concern		Modeling Threshold	Modeling Required?	Modeling Threshold	Modeling Required?	% of Level II
	lb/hr	T/yr	T/yr	Exceed?	T/yr	Exceed?	Level I		Level II		
NO_x	0	0	40	No	4	No	0.2 lb/hr	Yes	2.4 lb/hr	No	0%
							1.2 T/yr	Yes	14 T/yr	No	0%
CO	0	0	100	No	10	No	15 lb/hr	No	175 lb/hr	No	0.0%
PM_{10}	0.004	9.7E-03	15	No	1.5	No	0.22 lb/hr	Yes	2.6 lb/hr	No	0%
$PM_{2.5}$	0.004	9.7E-03	10	No	1	No	0.054 lb/hr	Yes	0.63 lb/hr	No	1%
							0.35 T/yr	Yes	4.1 T/yr	No	0%
SO_2	0	0	40	No	4	No	0.21 lb/hr	No	0.9 lb/hr	No	0.0%
							1 T/yr	No	7 T/yr	No	0.00%
VOC	0	0	40	No	4	No					
Lead	0	0	0.6	No	0.06	No	14 lb/mo	No	14 lb/mo	No	0.00%
	0	lb/month									
Total Criteria Emissions (ton/yr) =		**9.7E-03**									

Table 4-4
Facility Wide Controlled TAP Pollutant Emissions Increase

Non-Carcinogenic Toxic Air Pollutant (24 hr Average)	CAS	Restricted Uncontrolled Hourly Emissions[1]			Screening Emission Level (lb/hr)	Exceeds Screening Emission Level?	% Screening Emission Level
		Pre-Project (lb/hr)	Post Project (lb/hr)	Emission Change (lb/hr)			
Acetone	67-64-1	1.56E-01	1.56E-01	0.00E+00	1.19E+02	No	0.0%
Isopropyl alcohol	67-63-0	9.23E-08	9.23E-08	0.00E+00	6.53E+01	No	0.0%
Methyl alcohol	67-56-1	2.66E-06	2.66E-06	0.00E+00	1.73E+01	No	0.0%
1-butanol	71-36-3	6.61E-01	6.61E-01	0.00E+00	1.00E+01	No	0.0%
Methyl ethyl ketone	78-93-3	4.46E-03	4.46E-03	0.00E+00	3.93E+01	No	0.0%
Methyl Acetate	79-20-9	5.55E-01	5.55E-01	0.00E+00	4.07E+01	No	0.0%
Dichlorobenzene	95-50-1	1.73E-05	1.73E-05	0.00E+00	2.00E+01	No	0.0%
1,2,4-Trimethylbenzene	95-63-6	4.42E-01	4.42E-01	0.00E+00	8.20E+00	No	0.0%
Cumene	98-82-8	9.44E-02	9.44E-02	0.00E+00	1.63E+01	No	0.0%
Ethylbenzene	100-41-4	3.36E-01	3.36E-01	0.00E+00	2.90E+01	No	0.0%
1-Methoxy-2-Propanol Acetate	108-65-6	1.10E+00	1.10E+00	0.00E+00	2.40E+01	No	0.0%
Methyl Isobutyl Ketone	108-10-1	1.31E-01	1.31E-01	0.00E+00	1.37E+01	No	0.0%
1-Methoxy-2-Propanol Acetate	108-65-6	6.73E-01	6.73E-01	0.00E+00	2.40E+01	No	0.0%
1,3,5-trimethylbenzene	108-67-8	9.44E-02	9.44E-02	0.00E+00	8.20E+00	No	0.0%
Toluene	108-88-3	1.98E-02	1.98E-02	0.00E+00	2.50E+01	No	0.0%
2-butoxyethyl acetate	112-07-2	6.31E-01	6.31E-01	0.00E+00	8.33E+00	No	0.0%
Methyl isoamyl ketone	112-12-3	3.54E-05	3.54E-05	0.00E+00	1.60E+01	No	0.0%
n-butyl acetate	123-86-4	2.58E+00	2.58E+00	0.00E+00	4.73E+01	No	0.0%
Heptane	142-82-5	5.31E-06	5.31E-06	0.00E+00	1.09E+02	No	0.0%
Silicon Carbide	409-21-2	2.28E-04	2.28E-04	0.00E+00	6.67E-01	No	0.0%
tert-Butyl acetate	540-88-5	5.55E-01	5.55E-01	0.00E+00	6.33E+01	No	0.0%
Xylene	1330-20-7	4.14E-01	4.14E-01	0.00E+00	2.90E+01	No	0.0%
Carbon Black	1333-86-4	1.96E-05	1.96E-05	0.00E+00	2.30E-01	No	0.0%
Fe - fume	7439 89 6	1.53E-01	1.53E-01	4.04E-05	3.33E-01	No	0.0%
Mg - fume	7439 96 5	6.64E-04	9.06E-04	2.42E-04	3.33E-01	No	0.1%
Mn	7439 96 5	1.34E-03	1.34E-03	0.00E+00	3.33E-01	No	0.0%
Mn - fume	7439 96 5	8.61E-03	8.69E-03	8.08E-05	6.70E-02	No	0.1%
Molyb	7439 98 7	1.18E-03	1.18E-03	0.00E+00	6.67E-01	No	0.0%
Ba	7440-39-3	6.35E-05	6.35E-05	0.00E+00	3.30E-02	No	0.0%
Al	7440-47-3	1.13E-02	1.53E-02	4.03E-03	6.67E-01	No	0.6%
Cr	7440-47-3	4.68E-04	4.87E-04	1.92E-05	3.30E-02	No	0.1%
Co	7440-48-4	3.82E-05	3.82E-05	0.00E+00	3.30E-03	No	0.0%
Zn metal/dust	7440-66-6	4.47E-04	4.47E-04	0.00E+00	6.67E-01	No	0.0%
Zn - fume	7440-66-6	2.53E-03	2.53E-03	0.00E+00	3.33E-01	No	0.0%
Silicon	7440 21 3	6.11E-03	6.68E-03	5.66E-04	6.67E-01	No	0.1%
Cu	7440 50 8	8.74E-06	8.74E-06	0.00E+00	6.70E-02	No	0.0%
Cu - fume	7440 50 8	4.06E-03	4.08E-03	2.02E-05	1.30E-02	No	0.2%
P	7723-14-0	3.89E-05	3.89E-05	0.00E+00	7.00E-03	No	0.0%
Se	7782-49-2	3.46E-07	3.46E-07	0.00E+00	1.30E-02	No	0.0%
V. M. & P. Naphtha	64742-89-8 8032-32-4	6.15E-07	6.15E-07	0.00E+00	9.13E+01	No	0.0%

Carcinogenic Toxic Air Pollutant (Annual Average)	CAS	Restricted Uncontrolled Hourly Emissions[1]			Screening Emission Level (lb/hr)	Exceeds Screening Emission Level?	% Screening Emission Level
		Pre-Project (lb/hr)	Post Project (lb/hr)	Emission Change (lb/hr)			
Formaldehyde	50-00-0	6.4E-04	6.4E-04	0.00E+00	5.10E-04	No	0.0%
Benzo(a)pyrene	50-32-8	9.7E-09	9.7E-09	0.00E+00	2.00E-06	No	0.0%
3-Methylchloranthene	56-49-5	1.5E-08	1.5E-08	0.00E+00	2.50E-06	No	0.0%
Benzene	71-43-2	1.7E-05	1.7E-05	0.00E+00	8.00E-04	No	0.0%
Nickel	7440-02-0	2.8E-05	2.9E-05	1.11E-06	2.70E-05	No	4.1%
Arsenic	7440-38-2	1.6E-06	1.6E-06	0.00E+00	1.50E-06	No	0.0%
Beryllium	7440-41-7	1.3E-07	1.37E-07	6.64E-09	2.80E-05	No	0.0%
Cadmium	7440-43-9	8.9E-06	8.9E-06	0.00E+00	3.70E-06	No	0.0%
Cr+6	18540-29-9	1.4E-06	2.0E-06	5.54E-07	5.60E-07	No	98.9%
Polyaromatic Hydrocarbon (Max)		5.4E-06	5.4E-06	0.00E+00	9.10E-05	No	0.0%
Polycyclic Organics: 7-PAH Group		9.2E-08	9.2E-08	0.00E+00	2.00E-06	No	0.0%

1. Pre-Project Potential to Emit from: IDEQ,Tom Burnham, Permit Writer, Statement of Basis, Permit to Construct No. P-2016.0058, Project ID 62148 Western Trailer Co., Boise, Idaho, Facility ID 001-0037, Table 5 and Table 6, Final January 16, 2019.

Table 4-5
Facility-Wide Hazardous
Air Pollutant Emissions Summary

Hazardous Air Pollutant	**Pre Project Potential to Emit** (tons/year)	**Potential to Emit Increase** (tons./yr)	**Post Project Potential to Emit** (tons/yr)
Arsenic	4.1E-06	0.0E+00	4.1E-06
Benzene	4.3E-05	0.0E+00	4.3E-05
Beryllium	4.2E-07	0.0E+00	4.2E-07
Cadmium	2.2E-05	0.0E+00	2.2E-05
Chromium Compounds	1.1E-03	4.6E-05	1.1E-03
Chromium +6	1.9E-05	2.4E-06	2.1E-05
Cobalt Compounds	6.5E-05	0.0E+00	6.5E-05
Dichlorobenzene	2.4E-05	0.0E+00	2.4E-05
Ethylbenzene	8.4E-01	0.0E+00	8.4E-01
Formaldehyde	1.5E-03	0.0E+00	1.5E-03
Hexane	3.7E-02	0.0E+00	3.7E-02
Lead	1.0E-05	0.0E+00	1.0E-05
Manganese	2.4E-02	1.9E-04	2.4E-02
Methyl iIsobutyl Ketone	3.3E-01	0.0E+00	3.3E-01
Mercury	5.3E-06	0.0E+00	5.3E-06
Naphthalene	1.2E-05	0.0E+00	1.2E-05
Nickel Compounds	4.8E-04	4.8E-06	4.8E-04
Polycylic Organic Matter	2.3E-07	0.0E+00	2.3E-07
Selenium	4.9E-07	0.0E+00	4.9E-07
Toluene	4.9E-02	0.0E+00	4.9E-02
Xylene	1.0E+00	0.0E+00	1.0E+00
TOTAL =	2.3E+00	2.5E-04	2.3E+00

APPENDIX B – FACILITY DRAFT COMMENTS

The facility did not provide comments on the draft permit.

APPENDIX C – 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:	**Idaho**
Zip Code:	**83716**
Facility Contact:	**Tom Hogan**
Title:	
AIRS No.:	**336212**

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	0.0
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
Total:	0.0	0	**0.0**
Fee Due	**$ 1,000.00**		

Comments: