



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Permit to Construct No. P-2007.0175**

**Final**

**Snake River Trailer Company**

**Caldwell, Idaho**

**Facility ID No. 027-00097**

**September 26, 2007**

*CZ*  
**Carole Zundel**

**Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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## STATEMENT OF BASIS

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<b>Location:</b>	Caldwell, Idaho	<b>Facility ID No.</b> 027-00097

### Acronyms, Units, and Chemical Nomenclature

AAC	Acceptable ambient concentration
AACC	Acceptable ambient concentration for carcinogens
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	net screening emissions level
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
MMBtu/hr	million British thermal units per hour
MSDS	Material Safety Data Sheet(s)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM80	synthetic minor facility with a potential to emit greater than or equal to 80% of the major source threshold level(s)
SO <sub>2</sub>	sulfur dioxide
TAPs	toxic air pollutants
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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### 1. FACILITY DESCRIPTION

Snake River Trailer Company is a horse, cargo, and utility manufacturing and painting facility located at 315 Kit Avenue, Caldwell, Idaho. The facility includes two drive-through (“pull-through”) Paint Booths (PB-1 and PB-2), a Curing Booth (CR-1), and two 2.75 MMBtu/hr and one 0.225 MMBtu/hr natural gas-fired heaters that are used for facility heating purposes and for curing painted pieces of rolling stock.

### 2. APPLICATION SCOPE

The purpose of this application is to administratively amend PTC No. P-2007.0040, issued July 19, 2007, to require daily tracking of the process materials rather than daily calculation of the emissions.

#### 2.1 Application Chronology

August 21, 2007	DEQ received the application for a permit to construct modification
September 5, 2007	DEQ issued a completeness letter for the application
September 7, 2007	DEQ issued a facility draft permit
September 13, 2007	DEQ received comments on the draft permit

### 3. TECHNICAL ANALYSIS

#### 3.1 Emissions Inventory

There is no change in emissions as a result of this PTC action.

#### 3.2 Ambient Air Quality Impact Analysis

This PTC action is an administrative amendment with no change in emissions, so no impact analysis is required.

### 4. REGULATORY REVIEW

#### 4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, and Ozone. Reference 40 CFR 81.313.

#### 4.2 Permit to Construct (IDAPA 58.01.01.201)

This PTC action is exempt from the requirement to obtain a PTC in accordance with IDAPA 58.01.01.201 because there is no commencement of construction or increase of emissions.

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### 4.3 Permit Conditions Review

This section describes only those permit conditions (PC) that have been added, revised, modified or deleted as a result of this permitting action. All other permit conditions remain unchanged.

Existing PC 2.9

#### Material Usage Records

*The permittee shall monitor and record monthly, the usage of each horse, cargo, and utility trailer manufacturing and painting material that contains HAPs, TAPs, and/or VOCs. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

Revised PC 2.9

#### Material Usage Records

*The permittee shall monitor and record daily, the usage of each horse, cargo, and utility trailer manufacturing and painting material that contains HAPs, TAPs, and/or VOCs. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

This permit condition was revised to increase the monitoring from monthly to daily. This information will be used to calculate the emissions of HAPs, TAPs, and VOCs for all coatings used and to demonstrate 24-hour IDAPA 58.01.01.585 TAP compliance.

Existing PC 2.10

#### HAP Monitoring Requirements

*The permittee shall monitor and record the monthly and annual HAP emissions from the horse, cargo, and utility trailer manufacturing and painting material used, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.3. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

Modified PC 2.10

#### HAP Recordkeeping Requirements

*The permittee shall calculate the monthly and annual HAP emissions from the horse, cargo, and utility trailer manufacturing and painting material used, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.3. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

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This permit condition was modified to show that the HAP emissions are calculated, not monitored directly using HAP monitoring equipment or source testing.

Existing PC 2.11

### VOC Monitoring Requirements

*The permittee shall monitor and record the monthly and annual VOC emissions from the horse, cargo, and utility trailer manufacturing and painting material purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8 and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.4. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

Modified PC 2.11

### VOC Recordkeeping Requirements

*The permittee shall calculate the monthly and annual VOC emissions from the horse, cargo, and utility trailer manufacturing and painting material purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8 and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.4. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

This permit condition was modified to show that the VOC emissions are calculated, not monitored directly using VOC monitoring equipment or source testing.

Existing PC 2.12

### TAP Monitoring Requirements

*The permittee shall monitor and record the daily and hourly TAP emissions from the horse, cargo, and utility trailer manufacturing and painting material, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.5. Hourly emissions shall be determined by dividing daily emissions by the actual operating hours for that day. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

Modified PC 2.12

### TAP Recordkeeping Requirements

*The permittee shall calculate the TAP emissions from the horse, cargo, and utility trailer manufacturing and painting material, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.5. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.*

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This permit condition was modified to show that the TAP emissions are calculated, not monitored directly using TAP monitoring equipment or source testing. In addition, the requirement to calculate the TAP emissions hourly was removed because the TAP standards are 24-hour and annual standards, not hourly. The requirement to calculate TAP emissions daily was removed because the existing permit condition requires that the calculation be done "to demonstrate compliance with Permit Condition 2.5," which refers to IDAPA 58.01.01.210. Section 210 includes references to Sections 585 and 586, which contain listings of the TAP screening level emissions and acceptable ambient concentrations. This part of the permit condition was not modified.

The facility's current plan for showing compliance with Permit Condition 2.5 is to use the daily material tracking log and TAP concentrations for each type of material to calculate emissions as follows:

- 1) To be conservative, it is assumed that for all materials used, the entire amount of volatile TAP contained in the materials is emitted immediately. The solid (non-volatile) TAP will be emitted and controlled as PM.
- 2) On a log sheet, the material usage is recorded, in gallons, once per day for each material type used that day.
- 3) At the end of each month, the data from the monthly log sheets are entered into a spreadsheet.
- 4) The spreadsheet checks each day's use and finds the day with the highest amount used for each material. Because there are several materials, the highest use day for each material may be different.
- 5) The spreadsheet then takes the highest use amount for a material and calculates the TAP emissions. The spreadsheet does the same for each material.
- 6) The spreadsheet adds the TAP contributions from each material used.
- 7) The spreadsheet calculates the ambient concentration for comparison to the IDAPA 58.01.01.585 increments.
- 8) If no exceedance is found, then compliance with IDAPA 58.01.01.210 is demonstrated.
- 9) If an exceedance is found, then the facility will use a separate spreadsheet to calculate the actual emissions for each day of the month and calculate the ambient concentration for comparison to the IDAPA 58.01.01.585 increments to see if there is an exceedance of the increments.
- 10) Currently, there are no IDAPA 58.01.01.586 TAP emitted from the materials used.
- 11) For the purchase records, the total actual monthly amount of materials purchased are divided by the number of operating days and 24-hours per day to obtain an average hourly rate. This data is compiled monthly in the same way as the actual usage rates are.

### 5. PERMIT FEES

No permitting fee is due because this PTC action is administrative similar to a permit exemption determination or a typographical error which are exempt from permitting fees per IDAPA 58.01.01.224.

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**6. PUBLIC COMMENT**

No opportunity for public comment is required because a PTC is not required for this administrative action in accordance with IDAPA 58.01.01.201.

## **APPENDIX A – AIRS INFORMATION**

# AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** Snake River Trailers Company  
**Facility Location:** Caldwell, Idaho  
**AIRS Number:** 027-00097

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	B							A
PM <sub>10</sub>	B							A
PT (Particulate)	B							U
VOC	SM					Y	SM80	U
THAP (Total HAPs)	SM					Y	SM80	U
			APPLICABLE SUBPART					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).