



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-2009.0058

Final

Circle J Trailers, Inc.

Caldwell, Idaho

Facility ID No. 027-00064

June 29, 2009

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

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Acronyms, Units and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	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
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
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 ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
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
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

TIER I OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Circle J Trailers, Inc.	Permit No.	T1-2009.0058
Location:	Caldwell, Idaho	Facility ID No.	027-00064

1. INTRODUCTION AND APPLICABILITY

Circle J Trailers, Inc. (Circle J) is a manufacturer of horse and utility trailers located at 312 W. Simplot Blvd. in Caldwell, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit VOCs above the major source threshold of 100 tons per year. At the time of this permitting action, the facility is not a major source of HAP emissions.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Circle J Trailers, Inc.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Circle J's Tier I operating permit is organized into sections. They are as follows:

Section 1 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 3 through 4 – Building #2 – Fiberglass Roof Manufacturing, Building #5 – Painting Operations

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 5 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

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Section 6 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

2. FACILITY INFORMATION

2.1 Facility Description

Circle J Trailers, Inc. manufactures horse and utility trailers. Processes include welding, priming and painting, composite fiberglass lay-up. Western World was issued its renewal Tier I operating permit on September 22, 2005 – Tier I Operating Permit No. T1-040040. Circle J Trailers, Inc. has certified that the facility has not been modified since the renewal of its Tier I operating permit.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – 5-year permit term September 22, 2005 to September 22, 2010

The following information is the permitting history of this Tier I facility during the five-year permit term from September 22, 2005 to September 22, 2010. This 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).

September 22, 2005 Permit No. T1-040040, DEQ issued renewed Tier I operating permit

2.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This 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).

April 30, 1999 Permit No. 027-00064, DEQ issued initial PTC for the facility (S)

December 15, 2000 Permit No. 027-00064, DEQ issued initial Tier I operating permit (S)

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is an administrative amendment of the facility's currently effective Tier I operating permit No. T1-040040, issued September 22, 2005. The administrative amendment is for change of ownership from Western World, Inc. /Circle J Trailers to Circle J Trailers, Inc.

TIER I OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Circle J Trailers, Inc.	Permit No.	T1-2009.0058
Location:	Caldwell, Idaho	Facility ID No.	027-00064

3.2 Application Chronology

April 28, 2009	DEQ received application for Tier I operating permit administrative amendment for change of ownership from Western World, Inc./Circle J Trailers to Circle J Trailers, Inc.
June 17, 2009	DEQ provided draft permit to facility for review.
June 18, 2009	The facility informed DEQ that Rick Bowman will serve as both the facility contact and responsible official. No changes were proposed for the draft.
June 29, 2009	DEQ issued Tier I operating permit No. T1-2009.0058.

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. For details regarding the emissions units, process descriptions, and the emissions inventory for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. For details regarding the emissions limits and MRRR for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

5.1 Facility-wide Conditions

For details regarding the Facility-wide Conditions for this facility, refer to the Statement of Basis for the the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

5.2 Emissions Unit-specific Emissions Limits and MRRR

For details regarding the emissions unit-specific emissions limits and MRRR, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

5.3 General Provisions

For details regarding the General Provisions for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

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6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone.

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

This facility is classified as a major facility in accordance with IDAPA 58.01.01.008.10. Therefore, the requirements of IDAPA 58.01.01.301 do apply.

6.3 PSD Classification (40 CFR 52.21)

For details regarding the PSD Classification for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

6.4 NSPS Applicability (40 CFR 60)

For details regarding NSPS applicability for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

6.5 NESHAP Applicability (40 CFR 61)

For details regarding NESHAP applicability for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

6.6 MACT Applicability (40 CFR 63)

For details regarding MACT applicability for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

6.7 CAM Applicability (40 CFR 64)

For details regarding CAM applicability for this facility, refer to the Statement of Basis for the facility's renewal Tier I Operating Permit No. T1-040040, issued on September 22, 2005. This information was not changed as a result of this project.

7. PUBLIC COMMENT

This action is for a Tier I Administrative Amendment in accordance with IDAPA 58.01.01.381.01.d which specifies the following:

“An administrative permit amendment is a permit revision that:

- d. Allows for a change in ownership or operational control of a Tier I source where the Department determines that no other change in the Tier I operating permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Department.”

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The requirements for providing an opportunity for comment to the public, affected states and the EPA for a Tier I Administrative Amendment are specified by IDAPA 58.01.01.381.02.c. A copy of this rule is shown below. On that basis, an opportunity for public comment was not conducted for this amended permit to change the ownership or operational control.

“The Department shall, within sixty (60) days of the receipt of a request for an administrative permit amendment, take final action on the request and may incorporate such changes without providing notice to the public or affected States provided that the Department designates any such administrative permit amendment as having been made pursuant to Section 381. The Department shall submit a copy of the revised permit, or an addendum, to the EPA and send the original to the permittee.”

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ will provide the modified final permit to EPA Region 10 for its records.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification - Data Form

Facility Name: Circle J. Trailers, Inc.
Facility Location: 312 W. Simplot Blvd. Caldwell, ID 83605
Facility ID: 027-00064 **Date:** June 24, 2009
Project/Permit No.: T1-2009.0058 **Completed By:** Mary Capiral

Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
 Comments:

Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

SO2	PM10	VOC	
			DO NOT LEAVE ANY BLANK

Check one of the following:

SIP [0] - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR
 Title V [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:							

PSD [6] - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	□	□	□	□	□	□	□

NSR - NAA [7] - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	□	□	□	□	□	□	□

NESHAP [8] - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

NSPS [9] - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	□	□	□	□	□	□	□

MACT [M] - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?