



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier II Operating Permit and Permit to Construct No. T2 2008.0096

Final

Interstate Group LLC

Nampa, Idaho

Facility ID No. 027-00084

September 17, 2008

A handwritten signature in black ink, appearing to read "R. Baldwin", written over a horizontal line.

Robert Baldwin

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.

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CO	carbon monoxide
Cr	Chromium
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	Hazardous Air Pollutant
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	million British thermal unit
Mn	Manganese
NESHAP	National Emission Standards for Hazardous Air Pollutants
Ni	Nickel
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
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
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
TAP	Toxic Air Pollutant
T2	Tier II operating permit
T2/PTC	Tier II operating permit and permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

STATEMENT OF BASIS

Permittee:	Interstate Group, LLC	Permit No.	T2-2008.0096
Location:	Nampa, Idaho	Facility ID No.	027-00084

1. FACILITY INFORMATION

1.1 Facility Description

The Interstate Group Nampa facility manufactures over-the-road trailers of various sizes. Constructing the trailer frames involves welding the frame channel rails and completing the skeletal structure of the trailer using bent and straight tubes. Following completion of the frames, the trailer box structure is attached to pre-manufactured axles and wheels. The trailer is then washed, dried, and wired for lighting. In this step, the trailers are wiped down with xylene to prepare the metal surfaces for be painted. The next step in the process is to apply paint-finishing materials to the sheet metal box shell in the paint booth. After painting, the wiring is completed. Plywood is then installed for interior and floor surfaces. The out side of the trailer is covered with the prefinished sheet metal and the final trim and accessories are installed. The finished product is a complete trailer ready for sale to the trailer dealers.

1.2 Permitting Action and Facility Permitting History

This permit is the renewal of the Tier II operating permit and PTC for the Interstate Group facility located in Nampa. 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 as superceded (S).

August 27, 2003 T2-030032 A revision of the permitting action of T2-010717 (S).

March 13, 2003 T2-010717 The purpose of this permitting action was to establish federally enforceable limits necessary to exempt the facility from Title V permitting requirements and to demonstrate the facility's compliance with ambient air standards for criteria pollutants (S).

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This permitting action is for the Tier II operating permit and PTC renewal requested by the facility stating "We currently have not made any changes to our facility or products that are used in it, that have increased the emissions limits that is on our current permit."

2.2 Application Chronology

May 30, 2008 DEQ received the request for permit renewal
June 30, 2008 DEQ determined the application complete

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3. TECHNICAL ANALYSIS

3.1 Emission Unit and Control Device

Table 3.1 EMISSION UNIT AND CONTROL DEVICE INFORMATION

Emission Unit /ID No.	Emissions Unit Description	Control Device Description
3	Xylene trailer cleaning	None
3	Painting operations inside paint booth, HVLP spray gun	Paint booth, including arrestor filter pads for particulate matter control
3	Undercoat painting outside building, Airless spray equipment	Partial enclosure
3	Other sealants, adhesives, coatings	None

3.2 Emissions Inventory

Table 3.2 EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)														
Source Description	PM/PM ₁₀		NOx		CO		SO ₂		VOC		Single HAPs		Total HAPs	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	0.076	0.33											0.005	0.02
Paint, Coatings, Adhesives, and solvents (facilitywide)									2.97	35.6	0.83	9.88	1.5	18.0
Paints and coatings in paint booth (particulate emissions)	0.9	1.1												
Undercoating application (particulate emissions)	0.49	2.1												
Air makeup unit 1.33 MM Btu , natural gas	0.01	0.04	0.13	0.57	0.11	0.47	8 E-4	0.004	0.007	0.03	--	--	0.004	0.018
Total	1.48	3.57	0.13	0.57	0.11	0.47	8 E-4	0.004	2.98	35.63	0.83	9.88	1.51	18

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

**EMISSION INVENTORY BASED ON PTE Interstate Group, Nampa
Potential Emissions^a – Hourly (lb/hr) and Annual (T/yr)**

Source Description	Cr		Mn		Ni		Ethylbenzene		Ethyl Glycol		Hexane	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	--	--	--	--	--	--
Paint, Coatings, Adhesives, and solvents (facilitywide)							1.86	8.15	0.12	0.53	0.01	0.04
Air makeup unit 1.33 MM Btu , natural gas											0.0039	0.017
Total	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	1.86	8.15	0.12	0.53	0.014	0.057

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

**EMISSION INVENTORY BASED ON PTE Interstate Group, Nampa
Potential Emissions^a – Hourly (lb/hr) and Annual (T/yr)**

Source Description	Toluene		Xylene		Formaldehyde		Methylene diphenyl isocyanate		n-Butyl alcohol	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Paint, Coatings, Adhesives, and solvents (facilitywide)	4.8	9.88	8.23	9.88	--	--	0.014	0.06	0.01	0.04
Air makeup unit 1.33 MM Btu , natural gas					0.0002	0.0009				
Total	4.8	9.88	8.23	9.88	0.0002	0.0009	0.014	0.06	0.01	0.04

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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3.3 Ambient Air Quality Impact Analysis

There is no increase in emissions associated with this permit renewal; therefore, modeling is not 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 PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

Interstate Group is a synthetic minor facility that has emissions over eighty percent of a standard, thus classified as SM80. AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Interstate Group. This required information is entered into the EPA AIRS database.

4.2 Permit to Construct (IDAPA 58.01.01.201)

This section describes the regulatory analysis of the applicable air quality rules with respect to the PTC requirements of this permit. There were no increases in emissions or change in emission units, thus no new PTC requirements for this permitting action.

4.3 Tier II Operating Permit (IDAPA 58.01.01.401)

This section describes the regulatory analysis of the applicable air quality rules with respect to the Tier II requirements of this PTC/Tier II permit. There were no emissions increases, thus no modeling was required.

IDAPA 58.01.01.404.04.....Permit Revision and Renewal

This permitting action is a renewal of the Tier II operating permit T2-030032 issued on August 27, 2003. There is no emissions increase associated with this permit renewal; a public comment period is not required in accordance with IDAPA 58.01.01.404.04.

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

This facility is not applicable to Title V.

4.5 PSD Classification (40 CFR 52.21)

This facility is not applicable to PSD.

4.6 NSPS Applicability (40 CFR 60)

This facility is not applicable to NSPS.

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4.7 NESHAP Applicability (40 CFR 61)

This facility is not applicable to NESHAP.

4.8 MACT Applicability (40 CFR 63)

At the time of this permit renewal this facility is not applicable to MACT. However, MACT Subpart XXXXXX requires compliance for existing sources by July 23, 2011. Subpart XXXXXX is for facilities involved with metal fabrication and finishing and fabricated metal products.

MACT Subpart HHHHHH requires compliance for existing sources by January 10, 2011. Subpart HHHHHH is for facilities involved with paint stripping operations, surface coating, auto body, and misc.

4.9 CAM Applicability (40 CFR 64)

This facility is not applicable to CAM.

4.10 Permit Conditions Review

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

- 4.1 Renewal Permit Condition 2.4 was added to the standard facility wide conditions.
- 4.2 Existing Permit Condition 2.4 is renumbered as renewal Permit Condition 2.5.
- 4.3 Existing Permit Condition 2.5 is renumbered as renewal Permit Condition 2.6.
- 4.4 Existing Permit Condition 2.6 is renumbered as renewal Permit Condition 2.7.
- 4.5 Renewal Permit Condition 2.8 was added to the standard facility wide conditions.
- 4.6 Existing Permit Condition 2.7 is renumbered as General Provision 8.
- 4.7 Existing Permit Condition 2.8 is renumbered as renewal Permit Condition 2.9.
- 4.8 Existing Permit Condition 2.9 is omitted (Air Stagnation Advisory Days)
- 4.9 Existing Permit Condition 2.10 is renumbered as General Provision 7.
- 4.10 Existing Permit Condition 2.11 is renumbered as renewal Permit Condition 2.10.
- 4.11 Existing Permit Conditions 2.12 is renumbered as renewal Permit Condition 2.11
- 4.12 Existing Permit Condition 2.16 is renumbered as renewal Permit Condition 2.10.
- 4.13 Existing Permit Condition 2.17 is renumbered as renewal Permit Condition 2.11.

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- 4.14 Existing Permit Conditions 3.12, 3.13, and 3.14 have been combined and revised into Renewed Permit Condition 3.12 so the monitoring and recordkeeping requirements for this permit are more understandable, and so compliance with the emissions limits and operating requirements can be more easily determined.

5. PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. The facility is subject to a processing fee of \$5,000 because its permitted emissions are 58.24 tons per year. Stationary sources or facilities with permitted emissions of ten (10) to less than one hundred (100) tons per year have processing fees of \$5,000 per IDAPA 58.01.01.407.

Table 5.1 PROCESSING FEE TABLE

Emissions Inventory	
Pollutant	Annual Emissions (T/yr)
NO _x	0.57
SO ₂	0.004
CO	0.47
PM ₁₀	3.57
VOC	35.63
HAPS	18.0
Total:	58.24
Fee Due	\$ 5,000.00

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.404.04, a public comment period is not required because the proposed project is a permit renewal with no additional increase in allowable emissions.

Appendix A – AIRS Information

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Interstate Group LLC
Facility Location: 224 Carnation Drive, Nampa 83687
AIRS Number: 027-00084

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 ₂	B							U
NO _x	B							U
CO	B							U
PM ₁₀	B							U
PT (Particulate)	B							U
VOC	B							U
THAP (Total HAPs)	SM80					SM80		U
			APPLICABLE SUBPART					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b 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).

Appendix B – Emissions Inventory

Table 3.2 EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)														
Source Description	PM/PM ₁₀		NO _x		CO		SO ₂		VOC		Single HAPs		Total HAPs	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	0.076	0.33	--	--	--	--	--	--	--	--	--	--	0.005	0.02
Paint, Coatings, Adhesives, and solvents (facilitywide)			--	--	--	--	--	--	2.97	35.6	0.83	9.88	1.5	18.0
Paints and coatings in paint booth (particulate emissions)	0.9	1.1	--	--	--	--	--	--	--	--	--	--	--	--
Undercoating application (particulate emissions)	0.49	2.1	--	--	--	--	--	--	--	--	--	--	--	--
Air makeup unit 1.33 MM Btu , natural gas	0.01	0.04	0.13	0.57	0.11	0.47	8 E-4	0.004	0.007	0.03	--	--	0.004	0.018
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**Table 3.2 (continued) EMISSION INVENTORY BASED ON PTE Interstate Group, Nampa
Potential Emissions^a – Hourly (lb/hr) and Annual (T/yr)**

Source Description	Cr		Mn		Ni		Ethylbenzene		Ethyl Glycol		Hexane	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	--	--	--	--	--	--
Paint, Coatings, Adhesives, and solvents (facilitywide)	--	--	--	--	--	--	1.86	8.15	0.12	0.53	0.01	0.04
Air makeup unit 1.33 MM Btu , natural gas	--	--	--	--	--	--	--	--	--	--	0.0039	0.017
Total	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	1.86	8.15	0.12	0.53	0.014	0.057

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Air makeup unit 1.33 MM Btu , natural gas	--	--	--	--	0.0002	0.0009	--	--	--	--
Total	4.8	9.88	8.23	9.88	0.0002	0.0009	0.014	0.06	0.01	0.04

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