



**Air Quality Permitting
Statement of Basis**

September 22, 2005

Tier I Operating Permit Renewal No. T1-040040

Western World, Incorporated, Circle J Trailers; Caldwell, Idaho

Facility ID No. 027-00064

Prepared by:

Shawnee Chen, P.E., Senior Engineer
AIR QUALITY DIVISION

FINAL

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES	3
TIER I PUBLIC COMMENT / AFFECTED STATES / EPA REVIEW SUMMARY	4
1. PURPOSE	5
2. FACILITY DESCRIPTION	5
3. FACILITY / AREA CLASSIFICATION	5
4. APPLICATION SCOPE	5
5. PERMIT ANALYSIS	6
6. PERMIT CONDITIONS	6
7. PUBLIC COMMENT	7
8. RECOMMENDATION	8
9. AIRS	8

Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
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
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO₂	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM₁₀	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
SO₂	sulfur dioxide
UTM	Universal Transverse Mercator
VOC	volatile organic compound

Tier I Public Comment / Affected States / EPA Review Summary

A 30-day public comment period for Western World, Incorporated, Circle J Trailers draft Tier I operating permit was held from May 25, 2005 to June 22, 2005 in accordance with IDAPA 58.01.01.364, *Rules for the Control of Air Pollution in Idaho*. No comments were received.

IDAPA 58.01.01.008.01 defines *affected states* as: “*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source.*”

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of the state of Oregon. Therefore, the state of Oregon was also provided an opportunity to comment on the draft Tier I operating permit. No comments were received from the state of Oregon.

A 45-day review for the proposed Tier I operating permit will be held from July 22, 2005 to September 2, 2005 in accordance with IDAPA 58.01.01.366, *Rules for the Control of Air Pollution in Idaho*. EPA notified DEQ that EPA would not be reviewing the proposed permit action and would not object to its issuance on July 25, 2005.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.362, Rules for the Control of Air Pollution in Idaho, for issuing Tier I operating permits.

2. FACILITY DESCRIPTION

Western World, Inc. Circle J Trailers (Western World) manufactures horse and utility trailers. Processes include welding, priming and painting, composite fiberglass lay-up. Western World was issued its initial Tier I operating permit on December 15, 2000 – Tier I Operating Permit No. 027-00067. Western World has certified that the facility has not been modified during the term of its initial Tier I operating permit.

3. FACILITY / AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is not subject to any federal New Source Performance Standards (NSPS) in accordance with 40 CFR 60, National Emission Standards for Hazardous Air Pollutants (NESHAP) in accordance with 40 CFR 61, or National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories in accordance with 40 CFR 63. The SIC code defining the facility is 3715 and the facility classification is A.

Western World is located in Caldwell, Idaho, which is in Canyon County. Canyon County is located in Air Quality Control Region (AQCR) 64 and UTM Zone 11. The area is designated as an attainment or unclassifiable area for all regulated criteria air pollutants. There are no Class I areas located within ten (10) kilometers of the facility.

The AIRS information provided in Section 9 of this statement of basis defines the classification for each regulated air pollutant at Western World. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

Western World has submitted an application to renew its Tier I operating permit. Western World has certified that the facility has not been modified during the term of its initial Tier I operating permit.

4.1 *Application Chronology*

October 12, 2004	DEQ receives a Tier I operating permit renewal application from Western World
December 10, 2004	DEQ declares application incomplete
January 18, 2005	DEQ receives updated information from Western World
March 18, 2005	DEQ declares the application complete
May 25 to June 23, 2005	DEQ provides draft permit for public comment
July 21, 2005	DEQ provides proposed permit to EPA for its review

5. PERMIT ANALYSIS

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

5.1 Emissions Inventory

Please defer to the technical memorandum developed for Tier I Operating Permit No. 027-00067, issued December 15, 2000.

5.2 Modeling

Modeling is not required for Tier I operating permits.

5.3 Regulatory Review

IDAPA 58.01.01.369 *Tier I Operating Permit Renewal*

This regulation specifies the procedures for renewing Tier I operating permits.

5.4 Fee Review

Western World is a major facility as defined in IDAPA 58.01.01.008.10, and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

6. PERMIT CONDITIONS

There are no changes to the permit conditions for Building #2 and Building #3 except for numbering due to new formatting. Table 6.1 provides the cross reference between the renewal and the Tier I operating permit issued December 15, 2000. With the use of standard facility wide conditions and general provisions, there are minor differences between the renewal and the Tier I operating permit issued December 15, 2000 for the facility wide conditions and the general provisions. They are listed in the following table:

Table 6.1 PERMIT NUMBERING CROSS REFERENCE

Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal	Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal	Permit Numbering in Tier I operating permit Issued December 15, 2000	Permit Numbering in the Renewal
A.1	2.1	A.14	2.16	C.2	4.2
A.2	2.2	A.15	2.10	C.3	4.11
A.3	2.3	A.16	2.13	C.4	4.5
A.4	2.4	A.17	2.17	C.5	4.10
A.5	2.5	A.18	2.18	C.6	4.6
A.6	2.6	B.1	3.2	C.7	4.7
A.7	2.7	B.2	3.2	C.8	4.3
A.8	2.8	B.3	3.6	C.9	4.8
A.9	2.9	B.4	3.3	C.10	4.12
A.10	2.12	B.5	3.7	C.11	4.4
A.11	2.11	B.6	3.4	C.12	4.9
A.12	2.14	B.7	3.5		
A.13	2.15	C.1	4.1		

Facility –Wide Conditions

- 6.1 To be consistent with current standard facility wide conditions, “*Unless specified elsewhere in this permit,*” is deleted from Permit Condition A.3, A.4 and A.9; “*Federally enforceable; however, this provision will become state-only enforceable upon removal from the SIP*” is deleted from the citation of Permit Condition A.5; Permit Condition A.8 is reworded; “*Department*” is replaced with “*DEQ*”; “*log*” in Permit Condition A.9.5.1 is replaced with “*record*”; Permit Conditions A.14 and A.15 has been reworded; permit conditions are renumbered.

General Provisions

- 6.2 To be consistent with current standard general provisions, the effective date of the regulation is added to the citation for each permit condition; “*Section 213 is a State Only requirement, but has been submitted to EPA for federal approval*” is removed from the citation of General Provisions No.10; General Provisions No.16 about fees is revised as “*The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.*”; a specified reporting period of “*from November 1 to October 31*” is added to General Provisions No.21.1; Specified reporting periods of “*from November 1 to April 30*” and “*from May 1 to October 31*” are added to General Provisions No.24; General Provisions conditions are renumbered.

7. PUBLIC COMMENT

A 30-day public comment period for Western World, Incorporated, Circle J Trailers draft Tier I operating permit was held from May 25, 2005 to June 22, 2005 in accordance with IDAPA 58.01.01.364, No comments were received.

The state of Oregon, the affected state, was also provided an opportunity to comment on the draft Tier I operating permit. No comments were received.

A 45-day review for the proposed Tier I operating permit will be held from July 22, 2005 to September 2, 2005 in accordance with IDAPA 58.01.01.366, *Rules for the Control of Air Pollution in Idaho*. EPA notified DEQ that EPA would not be reviewing the proposed permit action and would not object to its issuance on July 25, 2005.

The draft permit was sent to Boise Regional Office on March 31, 2005. Boise Regional Office provided the comments on April 4, 2005. The comments will be addressed outside the Tier I permitting process because the issues are beyond the authority of Tier I permitting.

8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that Western World, Incorporated, Circle J Trailers be issued final Tier I Operating Permit No. T1-040040.

9. AIRS

Table 9.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B						U
PT (Particulate)	B						
VOC	A					A	U
THAP (Total HAPs)	B						
			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 NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- 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).