Statement of Basis

Permit to Construct No. P-2016.0012
Project ID 61687

Trails West Manufacturing of Idaho – Industrial Park
Preston, Idaho

Facility ID 041-00022

Final

September 30, 2016
Tom Burnham
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.

FACILITY INFORMATION

Description

Trails West is a manufacturer of horse, stock, and snowmobile trailers. Metal is cut to size on a laser cutting table within the facility. Trailer parts are assembled in the fab shop, sub-assembly, and weld portions of the plant. After assembly the trailers are washed and then primed using an epoxy primer in the prime/cure booth. The trailers are then prepared for painting in the caulking area of the plant. Painting of the trailers is done in a down draft paint booth. After painting the trailers are dried in the drying booth and cured in the cure booth. Trailers are then completed in the trim portion of the plant.

Permitting History

This is a replacement PTC for an existing facility that was constructed in 2016. A general automotive paint permit was initially issued to limit the facility to 4 gallons of paint per day. The automotive permit and this permit are being treated as the same project for this proposed new trailer manufacturing facility. This replacement PTC will permit the facility to perform all the activities in the trailer manufacturing process.

May 26, 2016	P-2016.0008, General Auto Coating Permit (S)

Application Scope

This PTC permits the entire facility. The initial general automotive permit was issued to allow the facility to start utilizing a portion of the painting capacity. This replacement PTC will permit the facility to perform all the activities in the trailer manufacturing process within the facility.

Application Chronology

April 4, 2016	DEQ received an application and an application fee.
July 27 – August 11, 2016	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
April 27, 2016	DEQ determined that the application was incomplete.
June 20, 2016	DEQ received supplemental information from the applicant.
June 22, 2016	DEQ determined that the application was incomplete.
June 29, 2016	DEQ received supplemental information from the applicant.
June 30, 2016	DEQ determined that the application was complete.
July 26, 2016	DEQ made available the draft permit and statement of basis for peer and regional office review.
August 3, 2016	DEQ made available the draft permit and statement of basis for applicant review.
August 15, 2016	DEQ received the permit processing fee.
August 24 – September 23, 2016	DEQ provided a public comment period on the proposed action.
September 30, 2016	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment	Emission Point ID No.
Emissions Unit Name: Welding Operations	none	EP8-EP12
Emissions Unit Name: Laser Cutting Operations	Control Device Name: Fabric filter within facility PM control efficiency: 95%	EP8-EP12
Emissions Unit Name: Primer Spraying Operations Spray Gun: Manufacturer: Iwata Model: LPH 200-LVP Booth Heater: Heat input rating: 1.075 MMBtu/hr Fuel: Natural gas	Control Device Name: Primer Booth Manufacturer: AFC Finishing Systems Model: ECFCSD7042 Manufacture Date: 02/01/2016 HPLV 65% transfer @ 6.56 gal/hr Filter: PM_{10} control efficiency: 99.7% Type: Cross draft	EP1
Emissions Unit Name: Paint Spraying Operations Spray Gun: Manufacturer: Iwata Model: LPH 200-LVP Booth Heaters (#1 and #2): Heat input rating: 2.0 MMBtu/hr each Fuel: Natural gas	Control Device Name: Primer Booth Manufacturer: AFC Finishing Systems Model: DTSDDDT7042 Manufacture Date: TBD HPLV 65% transfer @ 6.56 gal/hr Filter: PM_{10} control efficiency: 99.7% Type: Side draft	EP2 EP3 EP4 EP5
Emissions Unit Name: Drying Booth Booth Heater: Heat input rating: 1.075 MMBtu/hr Fuel: Natural gas	none	EP6
Emissions Unit Name: Cure Booth Booth Heater: Heat input rating: 1.075MMBtu/hr Fuel: Natural gas	none	EP7
Emissions Unit Name: Office Heaters (18 units) Heat input rating: 0.15 MMBtu/hr Fuel: Natural gas Office Heaters (4 units) Heat input rating: 0.12 MMBtu/hr Fuel: Natural gas	none	Building Heater Exhaust 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 trailer manufacturing operations at the facility (see Appendix A) associated with this proposed project.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined 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 **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each source. For this trailer manufacturing operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources						
Paint Booths	85.866	0.00	0.00	0.00	24.049	0.00
Heaters	0.346	0.027	3.903	1.661	0.228	0.0000047
Caulking	0.00	0.00	0.00	0.00	30.378	0.00
Welding	0.525	0.00	0.00	0.00	0.00	0.00
Cutting	4.335	0.00	0.00	0.00	0.00	0.00
Total, Point Sources	**91.07**	**0.03**	**3.90**	**1.66**	**54.66**	**0.00**

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. For this trailer manufacturing operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr. Then, the worst-case maximum HAP Potential to Emit was determined for this trailer manufacturing operation.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Cumene	0.078
Ethylbenzene	0.4081
Methanol	2.66065
Methyl Isobutyl Ketone	0.0513

Naphthalene	0.00325
Toluene	4.75255
Xylene	1.70105
Hexane	0.0072
Chromium	0.00028
Manganese	0.0641
Nickel	0.0002
Total	9.727

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 general automotive permit and this permitting action are being combined. Therefore, pre-project emissions are set to zero for all criteria pollutants.

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 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. For this trailer manufacturing operation Potential to Emit is based upon a proposed manufacturing operation day of 10 hours a day and 2080 hr/yr. Initial emissions inventory showed extended hours for the heaters, but those are shown below at 8760 hours to avoid excessive permit conditions and associated monitoring and recordkeeping.

Table 4 POST PROJECT CONTROLLED 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 and Prime Booths	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0.00	27.45	28.55
Heaters	0.08	0.35	0.01	0.03	0.89	3.9	0.38	1.661	0.05	0.23
Caulking	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.94	7.21
Welding	0.12	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post Project Totals	**0.31**	**0.58**	**0.01**	**0.03**	**0.89**	**3.90**	**0.38**	**1.661**	**34.44**	**35.99**

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. Since this facility is being treated as a new facility as described above and the pre-project emissions are set to zero for all criteria pollutants, the post project potential to emit in Table 4 above represents the change on potential to emit.

TAP Emissions

The permit limits daily toxic air pollutant emissions so they do not exceed the EL (lb/hr) multiplied by 24 (for TAPs listed in both IDAPA 58.01.01.585 and 586), or limits emissions such that they do not exceed the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585) and the acceptable ambient concentration for carcinogens ($\mu g/m^3$) (for TAPs listed in IDAPA 58.01.01.586).

The permit requires keeping records of emissions daily and annually, reporting whenever a modeling exercise is conducted to show that impacts are below acceptable ambient concentrations.

These permit conditions are consistent with permit conditions that have been issued to Charmac Trailers[1] and Guerdon Enterprises[2]. The applicant requested that they be issued these types of permit conditions.

Incorporation of federal requirement40 CFR 63, subpart HHHHHH relieves this state requirement for any TAPs that are also HAPs. It is presumed that EPA evaluated the 187 HAPs when developing the emission standards for new, modified or existing stationary sources regulated by 40 CFR Part 63; therefore, no further review is required under IDAPA 58.01.01.210 for these pollutants for sources subject to 40 CFR Part 63, including sources specifically exempted within the subpart. The Toxic Air Pollutants that are not one of the 187 Hazardous Air Pollutants will still need to be evaluated for compliance with IDAPA 210. Regardless, DEQ may also require a source to evaluate any pollutant under IDAPA Section 161 to ensure that pollutant alone, or in combination with any other contaminants, does not injure or unreasonably affect human or animal life or vegetation.

HAP Emissions

Table 3 above presents the uncontrolled HAPs pre project to be below major source thresholds. The post project controlled HAP emissions are slightly reduced due to a small amount of solid HAPs that are filtered as shown in Table 5 below.

Table 5 CONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Cumene	0.078
Ethylbenzene	0.4081
Methanol	2.66065
Methyl Isobutyl Ketone	0.0513
Naphthalene	0.00325
Toluene	4.75255
Xylene	1.70105
Hexane	0.0072
Chromium	0.000279
Manganese	0.063908
Nickel	0.000199
Total	9.726

1 Charmac Trailers, PTC P-2009.0095 issued January 6, 2010
2 Guerdon Enterprises, LLC, PTC P-201.0018 issued September 2, 2014

Ambient Air Quality Impact Analyses

DEQ's modeling guidance includes that if criteria air pollutant emissions are below regulatory concern (less than 10% of what is defined as significant) then modeling of those pollutants is not required. Since the applicant demonstrated in the emissions inventory that no criteria pollutant exceeds 10%, there are no further requirements to demonstrate compliance. The coating usage limits, control technology and associated monitoring requirements demonstrate particulate matter and VOC below BRC as described in the application.

Additionally, Permit Condition 2.3 regulates TAPs such that if any of the EL are exceeded, modeling will be required to meet the ambient air concentrations. If any Emission Levels are exceeded in daily monitoring, Permit Condition 2.12 requires the owner/operator to perform modeling and submit it to the department on an annual basis.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Franklin County, which is designated as attainment or unclassifiable for PM_{10}, SO_2, NO_2, CO, and Ozone, and non-attainment for $PM_{2.5}$. Refer to 40 CFR 81.313 for additional information.

A Reasonable Achievable Control Technology (RACT) analysis was performed because the area is soon to become a serious non-attainment area for $PM_{2.5}$ and working with DEQ's State Implementation Plan (SIP) group, it was agreed that a RACT analysis would be necessary to keep the new facility from becoming part of the inventory for the upcoming serious non-attainment designation. Meetings with management and SIP group also approved BRC levels to be used for modeling determinations as discussed in the Ambient Air Quality Impact analysis of this statement of basis. Implementing the RACT is believed to regulate $PM_{2.5}$ to well below BRC due to booths with filters and HPLV spray guns and, with coating usage limits in place, the $PM_{2.5}$ contribution the ambient air system is minimized and therefore unnecessary to regulate further with a limit. For a complete presentation of the RACT analysis, see Appendix C.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

A = Use when any one HAP has actual or potential emissions $\geq$ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions $\geq$ 25 T/yr.

SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits $\geq$ 8 T/yr of a single HAP or $\geq$ 20 T/yr of THAP.

SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.

B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

UNK = Class is unknown

For All Other Pollutants:

A = Actual or potential emissions of a pollutant are $\geq$ 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are $\geq$ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and

only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.

B = Actual and potential emissions are < 100 T/yr without permit restrictions.

UNK = Class is unknown.

Table 6 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	91.07	0.58	**100**	B
$PM_{10}/PM_{2.5}$	91.07	0.58	**100**	B
SO_2	0.03	0.03	**100**	B
NO_X	3.9	3.9	**100**	B
CO	1.66	1.66	**100**	B
VOC	54.66	35.99	**100**	B
HAP (single)	4.752	4.752	**10**	B
HAP (Total)	9.727	9.726	**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 new emissions source. 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.

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 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 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

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. DEQ is not delegated for this Subpart. See Appendix B for a complete breakdown and applicability analysis of this subpart.

Permit Conditions Review

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

Initial Permit Condition 1.1 through 1.3
These permit conditions introduce the project scope, permit status, and regulated sources.

Initial Permit Condition 2.1 and 2.2
These permit conditions describe the processes and controls at the facility

Emission Limit Permit Conditions

Initial Permit Condition 2.3
This permit condition limits daily TAP emissions rates to below the screening emission level multiplied by 24 for TAPs listed in Section 585 and for the TAPs listed in Section 586 of the rules, or below the emission rate that would cause an ambient impact to exceed the acceptable ambient concentration for that TAP. Daily emissions of equal to or less than the EL times 24 assures that maximum 24-hour average emissions rates are below the EL for TAPs listed in Section 585 and 586 of the Rules. If daily emissions exceed the EL times 24 then the facility shall model emission rates to determine ambient impacts. Under this permit condition TAP ambient impacts are limited from the facility to be less than the acceptable ambient concentration. The permit does allow the use of new paints and solvents provided those changes result in emissions that comply with the above described permit conditions.

Initial Permit Condition 2.4
This permit condition requires that coatings used at the facility should not contain VOC in excess of 5.7 pounds per gallon. A Reasonable Achievable Control Technology (RACT) analysis done for trailer manufacturing in the $PM_{2.5}$ non-attainment area required that coatings to be limited in VOC content. In this non-attainment area, winter weather and cold temperatures condense VOC into secondary fine particulate. For a complete presentation of the RACT analysis, see Appendix C.

Initial Permit Condition 2.5

Specifies that the permittee shall not use more than 23,000 gallons of paint in any 12 consecutive calendar month period. This is consistent with the emission inventory provided in the application. This condition serves to limit VOC and particulate matter emissions. In combination with HPLV application and spraying only in booths equipped with filters, the 23,000 gallon usage controls particulate matter emissions to below the modeling threshold discussed in the modeling section of this statement of basis. For the suite of paints included in the application along with heaters and caulking operations VOC emissions are estimated to be 36 tons per year. PM_{10} emissions from painting operations are estimated to be 0.06 tons per year and when combined with all other sources of emissions at the facility are less than the 1.5 ton per year modeling threshold. $PM_{2.5}$ emissions from painting operations are also estimated to be 0.06 tons per year and when combined with all other sources of emissions at the facility are less than the 1.0 ton per year modeling threshold.

Operating Requirement Permit Conditions

Initial Permit Condition 2.6
Emissions of odorous gases, liquids, or solids into the atmosphere are prohibited in accordance with IDAPA 58.01.01.776.

Initial Permit Condition 2.7

This condition limits the operating hours of the facility to 2080 hours for any 12 month consecutive period as described in the application.

Initial Permit Condition 2.8
The booth and building heating units shall only combust natural gas as fuel based on RACT analysis.

Initial Permit Condition 2.9
HVLP spray gun minimum transfer efficiency and filter booth minimum control efficiency based on RACT analysis and record keeping of equipment maintenance set forth.

Initial Permit Condition 2.10

Laser cutting operations are limited to table with filter inside the facility with 95% efficiency for PM emissions control as described in the application.

Monitoring and Recordkeeping Requirement Permit Conditions

Initial Permit Condition 2.11
Requirement for the permittee to maintain records of all odor complaints received and take appropriate corrective action.

Initial Permit Condition 2.12
This requires a modeling demonstration anytime a respective TAP emission limit is exceeded. For any TAP if the daily emissions (pounds per calendar day) exceed the TAP screening emissions multiplied by 24 then the source must model to determine ambient impacts. In accordance with the general provisions all emissions calculations shall remain on-site. This condition limits daily usage from exceeding emission levels (EL) for TAPs listed in IDAPA 58.01.01.585 and IDAPA 58.01.01.586. This is the better alternative to permitting this number of paints, primers, and epoxies because it will keep all emissions records and totals together. Also, the facility can change coatings at any time, and inspectors don't need to filter through a list of coatings looking for compliance.

Initial Permit Condition 2.13
This reporting condition requires recording and monitoring of coatings.

Initial Permit Condition 2.14
This reporting condition requires recording and monitoring hours of operations.

Initial Permit Condition 2.15

This reporting condition requires that a report be sent to DEQ each year on all required modeling performed due to TAPs exceedances as stated in Permit Condition 2.12.

Initial Permit Condition 2.16
In case of excess emissions the facility is to take immediate steps to correct the condition in accordance with IDAPA 58.01.01.132 and submitting excess emissions report in accordance with IDAPA 58.01.01.135.

40 CFR 63 Subpart HHHHHH Requirements (If Applicable)

Initial Permit Conditions 2.17 through 2.20
These permit conditions incorporate 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices including equipment requirements, training of personnel, recordkeeping, notifications, and reporting.

Initial Permit Condition 2.21
Should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of 40 CFR Part 63, Subpart HHHHHH shall govern, including any amendments to that regulation. Implicit in this condition is TAPs that are HAPs as mentioned in the TAPs discussion.

General Provision Permit Conditions

Initial Permit Condition 3.1
The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 3.2
The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.3
The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 3.4
The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 3.5
The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 3.6
The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 3.7
The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 3.8
The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 3.9
The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 3.10
The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.11
The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 3.12
The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 3.13
The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 3.14
The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 3.15
The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 3.16
The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

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. There was a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments were submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

APPENDIX A – EMISSIONS INVENTORIES

PM10 and VOC Emmissions for Trails West Manufacturing Facility #2

Spray Gun Efficency 65% Filter Efficency 99.7%

PRODUCT	Gallon Weight	Solids Wt%	Weight Solids per Gallon (lbs/gal)	Annual Max Gallons Used	Annual Max Solids Used (lbs)	Hours Operated per Year	Max Usage (gal/hr)	PM10 Emmisions (lb/hr)[a]	PM10 Emissions (tons/year)	Amount VOC per gallon (lbs)	Total VOC (lbs)	VOC Emissions (lb/hr)[b]	VOC Emissions (tons/year)
106	6.78	0.14	0.01	3922	37.23	2,600	1.51	0.00002	0.00002	4.4	17,256.80	6.64	8.63
130	6.61	29.30	1.94	25	48.42	2,600	0.01	0.00002	0.00003	0.0	0.00	0.00	0.00
131S	11.02	67.11	7.40	12	88.75	2,600	0.00	0.00004	0.00005	4.6	55.20	0.02	0.03
15303S	8.81	66.00	5.81	490	2,849.15	2,600	0.19	0.00115	0.00150	1.5	735.00	0.28	0.37
15305S	8.72	66.00	5.76	1350	7,769.52	2,600	0.52	0.00314	0.00408	1.5	2,025.00	0.78	1.01
15307S	8.79	66.00	5.80	525	3,045.74	2,600	0.20	0.00123	0.00160	1.5	787.50	0.30	0.39
15309S	9.25	80.00	7.40	185	1,369.00	2,600	0.07	0.00055	0.00072	0.0	0.00	0.00	0.00
15385S	7.02	0.00	0.00	248	0.00	2,600	0.10	0.00000	0.00000	4.1	1,016.80	0.39	0.51
15395S	6.95	0.00	0.00	60	0.00	2,600	0.02	0.00000	0.00000	4.2	252.00	0.10	0.13
15397S	6.92	0.00	0.00	24	0.00	2,600	0.01	0.00000	0.00000	4.1	98.40	0.04	0.05
189S	8.14	0.27	0.02	67.5	1.48	2,600	0.03	0.00000	0.00000	8.1	546.75	0.21	0.27
19301S	7.35	7.21	0.53	8	4.24	2,600	0.00	0.00000	0.00000	6.7	53.60	0.02	0.03
226S	8.37	1.01	0.08	2	0.17	2,600	0.00	0.00000	0.00000	0.0	0.00	0.00	0.00
22806S	6.71	3.84	0.26	18	4.64	2,600	0.01	0.00000	0.00000	5.6	100.80	0.04	0.05
22880S	8.17	20.34	1.66	28	46.53	2,600	0.01	0.00002	0.00002	1.1	30.80	0.01	0.02
2350S	8.02	57.00	4.57	1.5	6.86	2,600	0.00	0.00000	0.00000	3.4	5.10	0.00	0.00
29077151	13.85	75.59	10.47	0.24	2.51	2,600	0.00	0.00000	0.00000	3.6	0.86	0.00	0.00
359S	7.99	25.01	2.00	15.625	31.22	2,600	0.01	0.00001	0.00002	6.0	93.75	0.04	0.05
3602S	6.64	0.00	0.00	12	0.00	2,600	0.00	0.00000	0.00000	5.4	64.80	0.02	0.03
389S	8.14	0.72	0.06	8	0.47	2,600	0.00	0.00000	0.00000	8.1	64.80	0.02	0.03
3900S	6.49	0.00	0.00	495	0.00	2,600	0.19	0.00000	0.00000	6.5	3,217.50	1.24	1.61
45P7241	0.00	65.49	0.00	5550	0.00	2,600	2.13	0.00000	0.00000	0.0	0.00	0.00	0.00
45PN0001	0.00	53.57	0.00	72	0.00	2,600	0.03	0.00000	0.00000	0.0	0.00	0.00	0.00
7899E	7.78	31.31	2.44	8	19.49	2,600	0.00	0.00001	0.00001	5.2	41.60	0.02	0.02
825P30018	11.80	67.99	8.02	5800	46,532.36	2,600	2.23	0.01879	0.02443	3.2	18,560.00	7.14	9.28
48PN5636LG	8.88	49.62	4.41	506	2,229.57	2,600	0.19	0.00090	0.00117	2.7	1,366.20	0.53	0.68
8989S	8.17	5.00	0.41	13.5	5.51	2,600	0.01	0.00000	0.00000	7.8	105.30	0.04	0.05
936S	7.28	38.25	2.78	12	33.42	2,600	0.00	0.00001	0.00002	1.7	20.40	0.01	0.01
937S	7.65	54.83	4.19	1310	5,494.79	2,600	0.50	0.00222	0.00288	3.3	4,323.00	1.66	2.16
938S	7.75	54.79	4.25	70	297.24	2,600	0.03	0.00012	0.00016	3.4	238.00	0.09	0.12
946S	7.76	61.31	4.76	305	1,451.09	2,600	0.12	0.00059	0.00076	2.1	640.50	0.25	0.32
A-4115S	6.85	10.57	0.72	25.2	18.25	2,600	0.01	0.00001	0.00001	3.3	83.16	0.03	0.04
A	7.96	33.00	2.63	2	5.25	2,600	0.00	0.00000	0.00000	4.7	9.40	0.00	0.00
EX	8.67	59.20	5.13	357	1,832.35	2,600	0.14	0.00074	0.00096	3.3	1,178.10	0.45	0.59
EZ	10.23	57.40	5.87	855	5,020.58	2,600	0.33	0.00203	0.00264	3.3	2,821.50	1.09	1.41
F	7.91	57.90	4.58	1	4.58	2,600	0.00	0.00000	0.00000	5.0	5.00	0.00	0.00
LF-64034P	9.39	62.97	5.91	288	1,702.91	2,600	0.11	0.00069	0.00089	3.5	1,008.00	0.39	0.50
PT196	8.81	48.84	4.30	68	292.59	2,600	0.03	0.00012	0.00015	2.9	197.20	0.08	0.10
QA	10.15	47.00	4.77	72	343.48	2,600	0.03	0.00014	0.00018	1.4	100.80	0.04	0.05
Total				**22,811.57**	**80,589.36**			**0.03255**	**0.04231**		**57,103.62**	**21.96**	**28.55**

a = PM10 Emissions Formula: Solid Content (lbs/gal) * Max Usage (gal/hr) * (1-Spray Gun Efficency) * (1- Filter Efficency)
b = VOC Emissions Formula: Solid Content (lbs/gal) * Max Usage (gal/hr) Assumes 100% Vocs Emitted

Table 1: Trails West Manufacturing Facility #2 -Paint Booth PM and VOC Emmissi

Spray Gun Efficency 65% **Filter Efficency 99.7%**

PRODUCT	Gallon Weight	Solids Wt%	Weight Solids per Gallon (lbs/gal)
106	6.78	0.14	0.01
130	6.61	29.30	1.94
131S	11.02	67.11	7.40
15303S	8.81	66.00	5.81
15305S	8.72	66.00	5.76
15307S	8.79	66.00	5.80
15309S	9.25	80.00	7.40
15385S	7.02	0.00	0.00
15395S	6.95	0.00	0.00
15397S	6.92	0.00	0.00
189S	8.14	0.27	0.02
19301S	7.35	7.21	0.53
226S	8.37	1.01	0.08
22806S	6.71	3.84	0.26
22880S	8.17	20.34	1.66
2350S	8.02	57.00	4.57
29077151	13.85	75.59	10.47
359S	7.99	25.01	2.00
3602S	6.64	0.00	0.00
389S	8.14	0.72	0.06
3900S	6.49	0.00	0.00
45P7241	11.13	65.49	7.29
45PN0001	8.18	53.57	4.38
7899E	7.78	31.31	2.44
825P30018	11.80	67.99	8.02
848PN5636LG	8.88	49.62	4.41
8989S	8.17	5.00	0.41
936S	7.28	38.25	2.78
937S	7.65	54.83	4.19
938S	7.75	54.79	4.25
946S	7.76	61.31	4.76
A-4115S	6.85	10.57	0.72
A	7.96	33.00	2.63
EX	8.67	59.20	5.13
EZ	10.23	57.40	5.87
F	7.91	57.90	4.58
LF-64034P	9.39	62.97	5.91
PT196	8.81	48.84	4.30
QA	10.15	47.00	4.77
Total			

a = PM10 and PM2.5 Emissions Formula: Solid Content (lbs/gal) * Max Usage (gal/hr) * (1-Spray Gun Effi
b = VOC Emissions Formula: VOC Content (lbs/gal) * Max Usage (gal/hr) Assumes 100% Vocs Emitted
c= CEIDARS PM10 and PM2.5 emission factors for solvent based coatings

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Annual Max Gallons Used	Annual Max Solids Used (lbs)	Hours Operated per Year	Max Usage (gal/hr)	PM Emmisions-Uncontrolled (lb/hr)[a]
3922	37.23	2,080	1.89	0.00626
25	48.42	2,080	0.01	0.00815
12	88.75	2,080	0.01	0.01493
490	2,849.15	2,080	0.24	0.47942
1350	7,769.52	2,080	0.65	1.30737
525	3,045.74	2,080	0.25	0.51250
185	1,369.00	2,080	0.09	0.23036
248	0.00	2,080	0.12	0.00000
60	0.00	2,080	0.03	0.00000
24	0.00	2,080	0.01	0.00000
67.5	1.48	2,080	0.03	0.00025
8	4.24	2,080	0.00	0.00071
2	0.17	2,080	0.00	0.00003
18	4.64	2,080	0.01	0.00078
28	46.53	2,080	0.01	0.00783
1.5	6.86	2,080	0.00	0.00115
0.24	2.51	2,080	0.00	0.00042
15.625	31.22	2,080	0.01	0.00525
12	0.00	2,080	0.01	0.00000
8	0.47	2,080	0.00	0.00008
495	0.00	2,080	0.24	0.00000
5550	40,454.16	2,080	2.67	6.80719
72	315.51	2,080	0.03	0.05309
8	19.49	2,080	0.00	0.00328
5800	46,532.36	2,080	2.79	7.82996
506	2,229.57	2,080	0.24	0.37517
13.5	5.51	2,080	0.01	0.00093
12	33.42	2,080	0.01	0.00562
1310	5,494.79	2,080	0.63	0.92460
70	297.24	2,080	0.03	0.05002
305	1,451.09	2,080	0.15	0.24417
25.2	18.25	2,080	0.01	0.00307
2	5.25	2,080	0.00	0.00088
357	1,832.35	2,080	0.17	0.30833
855	5,020.58	2,080	0.41	0.84481
1	4.58	2,080	0.00	0.00077
288	1,702.91	2,080	0.14	0.28655
68	292.59	2,080	0.03	0.04923
72	343.48	2,080	0.03	0.05780
22,811.57	**121,359.02**			**20.42099**

cency) * (1- Filter Efficency)

PM Emmisions_Controlled (lb/hr)[a]	PM 10 Emission Factor[c]	PM10 Emissions-Uncontrolled (lb/hr)	PM10 Emissions-Controlled (lb/hr)
0.00002	0.96	0.00601	0.00002
0.00002	0.96	0.00782	0.00002
0.00004	0.96	0.01434	0.00004
0.00144	0.96	0.46025	0.00138
0.00392	0.96	1.25508	0.00377
0.00154	0.96	0.49200	0.00148
0.00069	0.96	0.22115	0.00066
0.00000	0.96	0.00000	0.00000
0.00000	0.96	0.00000	0.00000
0.00000	0.96	0.00000	0.00000
0.00000	0.96	0.00024	0.00000
0.00000	0.96	0.00068	0.00000
0.00000	0.96	0.00003	0.00000
0.00000	0.96	0.00075	0.00000
0.00002	0.96	0.00752	0.00002
0.00000	0.96	0.00111	0.00000
0.00000	0.96	0.00041	0.00000
0.00002	0.96	0.00504	0.00002
0.00000	0.96	0.00000	0.00000
0.00000	0.96	0.00008	0.00000
0.00000	0.96	0.00000	0.00000
0.02042	0.96	6.53490	0.01960
0.00016	0.96	0.05097	0.00015
0.00001	0.96	0.00315	0.00001
0.02349	0.96	7.51677	0.02255
0.00113	0.96	0.36016	0.00108
0.00000	0.96	0.00089	0.00000
0.00002	0.96	0.00540	0.00002
0.00277	0.96	0.88762	0.00266
0.00015	0.96	0.04802	0.00014
0.00073	0.96	0.23441	0.00070
0.00001	0.96	0.00295	0.00001
0.00000	0.96	0.00085	0.00000
0.00092	0.96	0.29600	0.00089
0.00253	0.96	0.81102	0.00243
0.00000	0.96	0.00074	0.00000
0.00086	0.96	0.27509	0.00083
0.00015	0.96	0.04726	0.00014
0.00017	0.96	0.05548	0.00017
0.06126		**19.60415**	**0.05881**

PM10 Emissions-Controlled (T/yr)	PM 2.5 Emission Factor[c]	PM2.5 Emissions-Uncontrolled (lb/hr)	PM2.5 Emissions-Controlled (lb/hr)	PM2.5 Emissions-Controlled (T/yr)
0.00002	0.925	0.00579	0.00002	0.00002
0.00002	0.925	0.00754	0.00002	0.00002
0.00004	0.925	0.01381	0.00004	0.00004
0.00144	0.925	0.44347	0.00133	0.00138
0.00392	0.925	1.20932	0.00363	0.00377
0.00154	0.925	0.47407	0.00142	0.00148
0.00069	0.925	0.21308	0.00064	0.00066
0.00000	0.925	0.00000	0.00000	0.00000
0.00000	0.925	0.00000	0.00000	0.00000
0.00000	0.925	0.00000	0.00000	0.00000
0.00000	0.925	0.00023	0.00000	0.00000
0.00000	0.925	0.00066	0.00000	0.00000
0.00000	0.925	0.00003	0.00000	0.00000
0.00000	0.925	0.00072	0.00000	0.00000
0.00002	0.925	0.00724	0.00002	0.00002
0.00000	0.925	0.00107	0.00000	0.00000
0.00000	0.925	0.00039	0.00000	0.00000
0.00002	0.925	0.00486	0.00001	0.00002
0.00000	0.925	0.00000	0.00000	0.00000
0.00000	0.925	0.00007	0.00000	0.00000
0.00000	0.925	0.00000	0.00000	0.00000
0.02039	0.925	6.29665	0.01889	0.01965
0.00016	0.925	0.04911	0.00015	0.00015
0.00001	0.925	0.00303	0.00001	0.00001
0.02345	0.925	7.24272	0.02173	0.02260
0.00112	0.925	0.34703	0.00104	0.00108
0.00000	0.925	0.00086	0.00000	0.00000
0.00002	0.925	0.00520	0.00002	0.00002
0.00277	0.925	0.85526	0.00257	0.00267
0.00015	0.925	0.04626	0.00014	0.00014
0.00073	0.925	0.22586	0.00068	0.00070
0.00001	0.925	0.00284	0.00001	0.00001
0.00000	0.925	0.00082	0.00000	0.00000
0.00092	0.925	0.28520	0.00086	0.00089
0.00253	0.925	0.78145	0.00234	0.00244
0.00000	0.925	0.00071	0.00000	0.00000
0.00086	0.925	0.26506	0.00080	0.00083
0.00015	0.925	0.04554	0.00014	0.00014
0.00017	0.925	0.05346	0.00016	0.00017
0.06116		**18.88941**	**0.05667**	**0.05893**

Amount VOC per gallon (lbs)	Total VOC (lbs)	VOC Emissions (lb/hr)[b]	VOC Emissions (tons/year)
4.4	17,256.80	8.30	8.63
0.0	0.00	0.00	0.00
4.6	55.20	0.03	0.03
1.5	735.00	0.35	0.37
1.5	2,025.00	0.97	1.01
1.5	787.50	0.38	0.39
0.0	0.00	0.00	0.00
4.1	1,016.80	0.49	0.51
4.2	252.00	0.12	0.13
4.1	98.40	0.05	0.05
8.1	546.75	0.26	0.27
6.7	53.60	0.03	0.03
0.0	0.00	0.00	0.00
5.6	100.80	0.05	0.05
1.1	30.80	0.01	0.02
3.4	5.10	0.00	0.00
3.6	0.86	0.00	0.00
6.0	93.75	0.05	0.05
5.4	64.80	0.03	0.03
8.1	64.80	0.03	0.03
6.5	3,217.50	1.55	1.61
0.0	0.00	0.00	0.00
0.0	0.00	0.00	0.00
5.2	41.60	0.02	0.02
3.2	18,560.00	8.92	9.28
2.7	1,366.20	0.66	0.68
7.8	105.30	0.05	0.05
1.7	20.40	0.01	0.01
3.3	4,323.00	2.08	2.16
3.4	238.00	0.11	0.12
2.1	640.50	0.31	0.32
3.3	83.16	0.04	0.04
4.7	9.40	0.00	0.00
3.3	1,178.10	0.57	0.59
3.3	2,821.50	1.36	1.41
5.0	5.00	0.00	0.00
3.5	1,008.00	0.48	0.50
2.9	197.20	0.09	0.10
1.4	100.80	0.05	0.05
	57,103.62	**27.45**	**28.55**

Table 2: Trails West Manufacturing Facilty #2- Caulking Operation VOCs

Product	Amount VOC Per Gallon(lbs)	Max Annual Used (Gallons)	Max Annual Total VOC (lbs)
Acryl-R Joint sealer	3.70	2,745.0	10,156.500
3M PB938 Adhesive	5.67	36.0	204.120
3M PB999 Adhesive	4.84	840.0	4,065.600
Total		3,621.0	14,426.220

Table 3: Trails West Manufacturing Facilty #2- Heaters Emissions

Product	Rated Heat Input (Mmbtu/hr)	Hours Operated per year	Emission Factor (lb/MMBtu)[a]
Prime Booth Heater	1.075	8,760	0.0076
Paint Booth Heater #1	2.000	8,760	0.0076
Paint Booth Heater #2	2.000	8,760	0.0076
Drying Booth	1.075	8,760	0.0076
Cure Booth	1.075	8,760	0.0076
Building Heaters	3.180	8,760	0.0076
Total	**10.405**		

a = Based on AP-42 Table 1.4-2(7/98) for PM_{10}, PM2.5, SO_2, VOC, and Pb and AP-42 Table 1.4-1(7/98) f

Table 4: Trails West Manufacturing Facilty #2- Welding Emissions

Product	Annual Electrode Used (lb)	Hours Operated per year	Electrode Used (lb/hr)
Welding Wire (E70S)	40,128	2,080	19
Welding Wire (ER5154)	1,680	2,080	1
Total			

a = Emission factors based on AP-42 Chapter 12.9 for Gas Metal Arc Welding E70S and ER5154 Weldin

Table 5: Trails West Manufacturing Facilty #2- Cutting Emissions (Laser Cutting)

Metal	Metal Thickness (in)	Metal Denisty (lb/in^3)	Kerf (width of cut) (in)
Aluminum	0.125	0.10116	0.028
Mild Steel	0.25	0.28287	0.028
Total			

Hours Operated	VOC Emissions (lb/hr)	VOC Emissions (tons/year)
2,080	4.883	5.078
2,080	0.098	0.102
2,080	1.955	2.033
	6.936	7.213

PM_{10}		$PM_{2.5}$		
Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/MMBtu)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)
0.00817	0.03578	0.0076	0.00817	0.03578
0.01520	0.06658	0.0076	0.01520	0.06658
0.01520	0.06658	0.0076	0.01520	0.06658
0.00817	0.03578	0.0076	0.00817	0.03578
0.00817	0.03578	0.0076	0.00817	0.03578
0.02417	0.10586	0.0076	0.02417	0.10586
0.07908	0.34636		0.07908	0.34636

or NO_x and CO

PM_{10}			$PM_{2.5}$	
Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)
5.20	0.10032	0.10433	5.20	0.10032
24.10	0.01947	0.02024	24.10	0.01947
	0.11979	0.12458		0.11979

ȷ Wire

Cutting Speed (in/min)	Fume Genration (% of particulate generated)	Hours of Operation	Metal Feed Rate (in/hr)	Filter Efficenecy (%)
142	5	2,080	8,520	95.0
142	5	2,080	8,520	95.0

a = Emission factor equation from the Swedish Institute of Production Engineering Research (http://www.e

Table 6: Trails West Manufacturing Facilty #2- Total Emissions (Controlled)

Totals	lb/hr	t/yr	Below Regulatory Concern Thresholds (t/yr)
PM10	0.30739	0.58381	1.5
PM2.5	0.30525	0.58158	1
VOC	34.4415	35.9933	4
SO2	0.0062	0.027	4
NOx	0.8911	3.903	4
CO	0.3792	1.661	10
Pb	0.0000047	0.0000208	0.06

Table 7: Trails West Manufacturing Facilty #2- Stack Parameters

Stack ID	Description	Stack Height (m)	Stack Diameter (m)
EP1	Prime Booth	8.5 (27.875ft)	0.86 (34 in)
EP2	Paint Booth	8.2 (26.896 ft)	0.86 (34 in)
EP3	Paint Booth	8.2 (26.896 ft)	0.86 (34 in)
EP4	Paint Booth	8.2 (26.896 ft)	0.86 (34 in)
EP5	Paint Booth	8.2 (26.896 ft)	0.86 (34 in)
EP6	Drying Booth Heater	8.2 (26.875 ft)	0.46 (18 in)
EP7	Cure Booth Heater	8.2 (26.875 ft)	0.46 (18 in)
EP8	Welding and Cutting Exhaust	5.0 (16.5 ft)	0.91 (36 in) Square
EP9	Welding and Cutting Exhaust	5.0 (16.5 ft)	0.91 (36 in) Square
EP10	Welding and Cutting Exhaust	5.0 (16.5 ft)	0.91 (36 in) Square
EP11	Welding and Cutting Exhaust	5.0 (16.5 ft)	0.91 (36 in) Square
EP12	Welding and Cutting Exhaust	5.0 (16.5 ft)	0.91 (36 in) Square
Total			

Table 8: Trails West Manufacturing Facilty #2- Uncontrolled Emission Rates

Description	PM10 Emission Rate (lb/hr)	PM10 Emission Rate (T/yr)	PM2.5Emission Rate (lb/hr)
Paint and Prime Booths	19.604	85.866	18.889
Heaters	0.079	0.346	0.079
Caulking	0.000	0.000	0.000
Welding	0.120	0.525	0.100
Cutting	0.994	4.355	0.994
	20.797	91.092	20.063

Table 9: Trails West Manufacturing Facilty #2- Emission Inventory Calculations

PM10

ıpa.gov/ttnchie1/efdocs/welding.pdf). Emmission Factor Calculated using Iowa DNR Laser Cutting Calculator (http

Percent of Threshold (%)
38.92%
58.16%
899.83%
0.68%
97.58%
16.61%
0.03%

Stack Flowrate (cfm)	Stack Velocity (m/s)
18,000	14.50
14,000	11.28
14,000	11.28
14,000	11.28
14,000	11.28
3,500	10.06
3,500	10.06
12,000	6.77
12,000	6.77
12,000	6.77
12,000	6.77
12,000	6.77

PM2.5 Emission Rate (T/yr)	SO2 Emission Rate (lb/hr)	SO2 Emission Rate (T/yr)	NOx Emission Rate (lb/hr)	NOx Emission Rate (T/yr)
82.736	0.000	0.000	0.000	0.000
0.346	0.006	0.027	0.891	3.903
0.000	0.000	0.000	0.000	0.000
0.439	0.000	0.000	0.000	0.000
4.355	0.000	0.000	0.000	0.000
87.877	0.006	0.027	0.891	3.903

PM2.5

SO_2			
Emission Factor (lb/MMBtu)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/MMBtu)[a]
0.0006	0.0006	0.003	0.0940
0.0006	0.0012	0.005	0.0940
0.0006	0.0012	0.005	0.0940
0.0006	0.0006	0.003	0.0940
0.0006	0.0006	0.003	0.0940
0.0006	0.0019	0.008	0.0940
	0.0062	0.027	

	Chromium		
Yearly Emissions (tons/year)	Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)
0.10433	0.010	0.00019	0.00020
0.02024	0.100	0.00008	0.00008
0.12458		0.00027	0.00028

PM_{10}			
Emission Factor (lb/in)[a]	Hourly Emissions-Uncontrolled (lb/hr)	Hourly Emissions-Controlled (lb/hr)	Annual Emissions-Controlled(tons/year)
0.0000177	0.15082	0.00754	0.00784
0.0000990	0.84352	0.04218	0.04386
	0.99434	0.04972	0.05171

NO_x		CO		
Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/MMBtu)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)
0.1011	0.443	0.0400	0.0430	0.188
0.1880	0.823	0.0400	0.0800	0.350
0.1011	0.443	0.0400	0.0430	0.188
0.1011	0.443	0.0400	0.0430	0.188
0.1011	0.443	0.0400	0.0430	0.188
0.2989	1.309	0.0400	0.1272	0.557
0.8911	3.903		0.3792	1.661

Cobalt			Manganese	
Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)
0.010	0.00019	0.00020	3.180	0.06135
0.000	0.00000	0.00000	0.340	0.00027
	0.00019	0.00020		0.06162

$PM_{2.5}$			
Emission Factor (lb/in)[a]	Hourly Emissions- Uncontrolled (lb/hr)	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)
0.0000177	0.15082	0.00754	0.00784
0.0000990	0.84352	0.04218	0.04386
	0.99434	0.04972	0.05171

VOC			Pb	
Emission Factor (lb/MMBtu)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)	Emission Factor (lb/MMBtu)[a]	Hourly Emissions (lb/hr)
0.0055	0.0059	0.026	0.0000005	0.0000005
0.0055	0.0110	0.048	0.0000005	0.0000010
0.0055	0.0059	0.026	0.0000005	0.0000005
0.0055	0.0059	0.026	0.0000005	0.0000005
0.0055	0.0059	0.026	0.0000005	0.0000005
0.0055	0.0175	0.077	0.0000005	0.0000016
	0.0521	0.228		0.0000047

	Nickel		
Yearly Emissions (tons/year)	Emission Factor (lb/1,000 lbs of electrode)[a]	Hourly Emissions (lb/hr)	Yearly Emissions (tons/year)
0.06380	0.010	0.00019	0.0002006
0.00029	0.000	0.00000	0.0000000
0.06409		0.00019	0.0002006

Description	PM10 Emission Rate (lb/hr)	Hours Operated per day (hr)	PM10 Emission Rate 24-hour Average (lb/hr)
Paint and Prime Booths	0.059	10	0.0245
Heaters	0.079	10	0.0329
Welding	0.120	10	0.0499
Cutting	0.04972	10	0.0207

2015

Trails)055184674
West
Preston Idaho

Sara313/VOC
TRACKING TOOL

					CAS Number	95-63-6		7429-90-5	
PRODUCT	GALLON WEIGHT	VOC	GALLONS USED	TOTAL VOC pounds	1,2,4-TRIMETHYL BENZENE		ALUMINUM		
----------	------	--------	-------	------	weight%	pounds	weight%	pounds	
106	6.78	6.78	**3922**	26591.2	0.0	0.0	0.0	0.0	
130	6.61	6.61	**25**	165.3	0.0	0.0	0.0	0.0	
131S	11.02	4.60	**12**	55.2	0.0	0.0	0.0	0.0	
15303S	8.81	2.99	**490**	1466.1	0.0	0.0	0.0	0.0	
15305S	8.72	2.96	**1350**	3996.0	0.0	0.0	0.0	0.0	
15307S	8.79	2.98	**525**	1564.5	0.0	0.0	0.0	0.0	
15309S	9.25	1.85	**185**	342.3	0.0	0.0	0.0	0.0	
15385S	7.02	7.02	**248**	1741.0	3.0	52.2	0.0	0.0	
15395S	6.95	6.95	**60**	417.0	0.0	0.0	0.0	0.0	
15397S	6.92	6.92	**24**	166.1	0.0	0.0	0.0	0.0	
189S	8.14	8.11	**67.5**	547.4	0.0	0.0	0.0	0.0	
19301S	7.35	6.70	**8**	53.6	0.0	0.0	0.0	0.0	
226S	8.37	8.28	**2**	16.6	0.0	0.0	0.0	0.0	
22806S	6.71	5.60	**18**	100.8	0.0	0.0	0.0	0.0	
22880S	8.17	6.51	**28**	182.3	0.0	0.0	0.0	0.0	
2350S	8.02	3.45	**1.5**	5.2	3.0	0.4	0.0	0.0	
29077151	13.60	3.32	**0.24**	0.8	0.0	0.0	0.0	0.0	
359S	7.99	5.99	**15.625**	93.6	8.0	10.0	0.0	0.0	
3602S	6.64	6.64	**12**	79.7	2.0	1.6	0.0	0.0	
389S	8.14	8.06	**8**	64.5	0.0	0.0	0.0	0.0	
3900S	6.49	6.49	**495**	3212.6	8.0	257.0	0.0	0.0	
45P7241	11.13	3.84	**5550**	21312.0	0.0	0.0	0.0	0.0	
45PN0001	8.18	3.80	**72**	273.4	0.0	0.0	0.0	0.0	
7899E	7.78	5.34	**8**	42.8	0.0	0.0	0.0	0.0	
825P30018	11.80	3.78	**5800**	21906.6	4.0	2737.6	0.0	0.0	
PN5636LG	8.88	4.47	**506**	2261.8	0.0	0.0	0.0	0.0	
8989S	8.16	7.75	**13.5**	104.7	0.0	0.0	0.0	0.0	
936S	7.28	4.50	**12**	53.9	0.0	0.0	0.0	0.0	
937S	7.64	3.45	**1310**	4519.5	0.0	0.0	0.0	0.0	
938S	7.75	3.50	**70**	245.2	0.0	0.0	0.0	0.0	
946S	7.76	3.00	**305**	915.6	0.0	0.0	0.0	0.0	
A-4115S	6.72	5.92	**25.2**	149.3	0.0	0.0	0.0	0.0	
A*	8.17	4.70	**2**	9.4	0.0	0.0	0.0	0.0	
EX*	9.13	4.72	**357**	1685.0	0.0	0.0	1.2	39.1	
EZ*	8.96	3.81	**855**	3257.6	0.0	0.0	0.0	0.0	
F*	8.34	4.83	**1**	4.8	0.0	0.0	0.0	0.0	
LF-64034P	9.39	3.48	**288**	1001.4	3.0	81.1	0.0	0.0	
PT196	8.81	2.90	**68**	197.2	0.0	0.0	0.0	0.0	
QA*	11.00	2.08	**72**	149.8	0.0	0.0	0.0	0.0	

TOTALS 22811.6 98951.3 3139.9 39.1

7738-94-5		136-52-7		98-82-8		100-41-4		67-5
CHROMIC ACID		COBALT OCTOATE		CUMENE		ETHYLBENZENE		METHYL A
weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%
0.0	0.0	0.0	0.0	0.0	0.0	0.8	212.7	20.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	2.2	2.9	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.2	3.5	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	3.3	1.9	0.0
1.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0
0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.7	0.0
0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	1.5	0.0	0.0
0.0	0.0	0.0	0.0	0.4	0.5	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	4.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.4	12.9	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.2	136.9	0.4	273.8	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.5	22.5	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.8	0.0
0.0	0.0	0.0	0.0	0.0	0.0	1.8	180.2	0.0
0.0	0.0	0.0	0.0	0.4	2.2	0.9	4.9	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.5	0.8	0.0
0.0	0.0	0.1	0.02	0.0	0.0	5.0	0.8	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	4.5	0.4	0.0
0.0	0.0	0.0	0.0	0.0	0.0	4.2	113.6	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	0.2		**0.02**		**156.0**		**816.0**	

;6-1	108-10-1		71-36-3		91-20-3		61788-71-4	
ALCOHOL	METHYL ISOBUTYL KETONE		N-BUTYL ALCOHOL		NAPHTHALENE		NAPHTHENIC ACID, (NICKEL SALT)	
pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds
5318.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	15.7	9.2	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1.2	0.3	0.4	39.0	47.1	0.0	0.0	0.0	0.0
0.0	0.0	0.0	5.0	11.4	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	4.0	0.1	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3.2	0.0	0.0	17.0	13.5	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	4.0	2737.6	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	13.0	11.4	0.0	0.0	0.0	0.0
0.0	0.0	0.0	26.0	2602.2	0.0	0.0	0.0	0.0
0.0	0.0	0.0	13.0	70.5	1.2	6.5	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	2.4	4.1	9.0	15.2	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.4	0.1
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	3.3	89.2	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5322.6		**102.9**		**5509.1**		**6.5**		**0.1**

108-88-3		1330-20-7		1314-13-2		7779-90-0		67-6
TOLUENE		XYLENE		ZINC OXIDE		ZINC PHOSPHATE		ACET
weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%
30.0	7977.3	3.0	797.7	0.0	0.0	0.0	0.0	37.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0
16.0	21.2	9.0	11.9	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	48.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13.0	7.6	13.0	7.6	0.0	0.0	0.0	0.0	4.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1.0	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	1.0	2.3	3.0	6.9	0.0	0.0	48.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	15.0	0.5	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8.0	6.4	0.0	0.0	0.0	0.0	0.0	0.0	26.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1.0	32.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	15.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.0
0.0	0.0	2.0	1368.8	0.0	0.0	2.0	1368.8	15.0
2.0	89.9	2.0	89.9	0.0	0.0	0.0	0.0	15.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	4.0	3.5	0.0	0.0	0.0	0.0	37.0
0.0	0.0	7.0	700.6	0.0	0.0	0.0	0.0	0.0
0.0	0.0	4.0	21.7	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	2.0	3.4	0.0	0.0	1.0	1.7	0.0
9.7	1.6	22.6	3.7	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	18.0	1.5	0.0	0.0	0.0	0.0	0.0
0.0	0.0	17.0	459.7	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	26.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	8137.3		**3472.8**		**6.9**		**1370.5**	

4-1	8032-32-4		79-20-9		123-86-4		110-12-3	
ONE	VM & P NAPHTHA		METHYL ACETATE		N-BUTYL ACETATE		METHYL ISOAMYL KETONE	
pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds
9838.7	15.0	3988.7	0.0	0.0	0.0	0.0	0.0	0.0
165.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	26.0	1122.4	15.0	647.5	15.0	647.5
0.0	0.0	0.0	26.0	3060.7	0.0	0.0	0.0	0.0
0.0	0.0	0.0	26.0	1199.8	0.0	0.0	0.0	0.0
0.0	0.0	0.0	26.0	444.9	0.0	0.0	0.0	0.0
835.7	0.0	0.0	0.0	0.0	15.0	261.1	26.0	452.6
200.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
79.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2.4	0.0	0.0	0.0	0.0	4.0	2.4	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
109.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	15.0	1.8	0.0	0.0
0.0	0.0	0.0	0.0	0.0	4.0	0.1	0.0	0.0
0.0	0.0	0.0	0.0	0.0	59.0	73.7	0.0	0.0
20.7	15.0	12.0	0.0	0.0	0.0	0.0	15.0	12.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	59.0	1895.4	0.0	0.0	0.0	0.0	0.0	0.0
2470.9	0.0	0.0	0.0	0.0	26.0	16060.6	4.0	2470.9
88.3	0.0	0.0	0.0	0.0	26.0	153.1	0.0	0.0
2.5	0.0	0.0	0.0	0.0	15.0	9.3	0.0	0.0
10266.0	0.0	0.0	0.0	0.0	0.0	0.0	15.0	10266.0
674.0	0.0	0.0	0.0	0.0	15.0	674.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
32.3	0.0	0.0	4.0	3.5	0.0	0.0	15.0	13.1
0.0	0.0	0.0	4.0	400.3	0.0	0.0	15.0	1501.3
0.0	0.0	0.0	4.0	21.7	0.0	0.0	15.0	81.4
0.0	0.0	0.0	15.0	355.0	0.0	0.0	15.0	355.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
155.8	0.0	0.0	0.0	0.0	15.0	89.9	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
24942.2		**5896.0**		**6608.4**		**17973.5**		**15799.8**

108-83-8		822-06-0		108-65-6		141-78-6		78-
DIISOBUTYL KETONE		HEXAMETHYLENE DIISOCYANATE		1-METHOXY-2-PROANOL ACETATE		ETHYL ACETATE		METHYL KET
weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15.0	1765.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15.0	692.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.1	1.7	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	26.0	452.6	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	15.0	62.6	15.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	37.0	21.8	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	26.0
0.0	0.0	0.0	0.0	4.0	0.1	4.0	0.1	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	4.0	2470.9	4.0	2470.9	0.0
0.0	0.0	0.0	0.0	0.0	0.0	4.0	23.6	4.0
0.0	0.0	0.0	0.0	0.0	0.0	26.0	16.2	4.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	4.0	179.7	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.0
0.0	0.0	0.0	0.0	0.0	0.0	4.0	24.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	2458.0		**1.7**		**2945.4**		**2777.0**	

)3-3	110-43-0		67-63-0		1333-86-4		110-19-0	
. ETHYL ONE	METHYL N-AMYL KETONE		ISOPROPYL ALCHOL		CARBON BLACK		ISOBUTYL ACETATE	
pounds	weight%	pounds	weight%	pounds	weight%	pounds	weight%	pounds
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	15.0	1765.8	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
62.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	15.0	24.9	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	4.0	2.4	15.0	8.8	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	15.0	34.3	0.2	0.5	0.0	0.0
3.1	15.0	1.8	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	4.0	0.1	0.0	0.0	4.0	0.1
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	15.0	12.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	4.0	128.5	0.0	0.0	0.0	0.0
0.0	4.0	2470.9	4.0	2470.9	0.0	0.0	0.0	0.0
23.6	15.0	88.3	4.0	23.6	1.7	10.0	0.0	0.0
2.5	26.0	16.2	15.0	9.3	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	15.0	674.0	0.0	0.0	1.0	44.9	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	26.0	615.4	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
108.2	4.0	108.2	0.0	0.0	2.1	56.8	0.0	0.0
0.0	26.0	155.8	15.0	89.9	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
199.9		**5308.2**		**3392.7**		**112.2**		**0.1**

142-82-5		540-84-1		628-63-7	
HEPTANE		2,2,4-TRIMETHYL-PENTANE		N-AMYL-ACETATE	
weight%	pounds	weight%	pounds	weight%	pounds
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
15.0	12.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
15.0	481.9	4.0	128.5	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	4.0	179.7
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	0.0	0.0
0.0	0.0	0.0	0.0	4.0	24.0
0.0	0.0	0.0	0.0	0.0	0.0

493.8 **128.5** **203.7**

APPENDIX B – FRA

Title 40: Protection of Environment
PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)
Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

§63.11169 WHAT IS THE PURPOSE OF THIS SUBPART?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of "research and laboratory activities" in §63.11180.

(5) Surface coating or paint stripping that meets the definition of "quality control activities" in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

Regulatory Analysis:

Trails West conducts spray applied surface coating operations on horse trailers at their manufacturing facility. The surface coating operations are subject to this subpart.

§63.11170 AM I SUBJECT TO THIS SUBPART?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

Regulatory Analysis:

Trails West conducts spray applied surface coating operations on horse trailers at their manufacturing facility. The surface coating operations are subject to this subpart.

§63.11171 HOW DO I KNOW IF MY SOURCE IS CONSIDERED A NEW SOURCE OR AN EXISTING SOURCE?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

Regulatory Analysis:

Trails West has a paint mixing room, two spray booths with associated spray guns and equipment to apply primer and paint to horse and snowmobile trailers, spray gun cleaning equipment, and a solvent reclaimer. The paint booths and painting equipment at the facility were constructed and installed in 2016 and are classified as an new source under this subpart.

§63.11172 WHEN DO I HAVE TO COMPLY WITH THIS SUBPART?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

Regulatory Analysis:

Trails West is classified as a new source under this subpart and will be in compliance with this subpart upon initial startup of the paint booths.

§63.11173 WHAT ARE MY GENERAL REQUIREMENTS FOR COMPLYING WITH THIS SUBPART?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply

with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

- [73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

Regulatory Analysis:

All Trails West personnel who perform painting operations at the facility are certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment in compliance with this subpart. Any new employees will be trained and certified no later than 180 days after hiring.

The spray booths used to apply surface coatings to the trailers are fully enclosed with four complete walls and a full roof and are ventilated using negative pressure. The filters used in the paint booths achieve an 99.7 percent capture of paint overspray.

All spray applied coatings at Trails West are applied with a HVLP spray gun. Additionally all the spray guns are cleaned such that no cleaning solvent or paint residue is created outside of the solvent reclaimer.

§63.11174 WHAT PARTS OF THE GENERAL PROVISIONS APPLY TO ME?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

Regulatory Analysis:

Trails West is not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) and is not obligated to obtain a permit under 40 CFR part 70 or 71.

§63.11175 WHAT NOTIFICATIONS MUST I SUBMIT?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

Regulatory Analysis:

Trails West will submit a initial notification and if needed a notification of compliance status to the EPA no later than 180 days after initial startup.

§63.11176 WHAT REPORTS MUST I SUBMIT?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

Regulatory Analysis:

After Trails West has achieved compliance with this subpart an annual notification of changes report will be completed and submitted to the EPA.

§63.11177 WHAT RECORDS MUST I KEEP?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

Regulatory Analysis:

Trails West will keep records pertaining to painters certifications, filter efficiency documentation, spray gun documentation, copies of notifications and reports, a record of any deviations from this subpart, and a record of any assessments of compliance to this subpart.

§63.11178 IN WHAT FORM AND FOR HOW LONG MUST I KEEP MY RECORDS?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Regulatory Analysis:

Trails West will keep printed or electronic records at the manufacturing facility for a minimum of five years.

§63.11179 WHO IMPLEMENTS AND ENFORCES THIS SUBPART?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

§63.11180 WHAT DEFINITIONS DO I NEED TO KNOW?

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Administrator means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

Aerospace vehicle or component means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

Airless and air-assisted airless spray mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.

(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

Compliance date means the date by which you must comply with this subpart.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

Dry media blasting means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

Electrostatic application means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Equipment cleaning means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

Facility maintenance means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

High-volume, low-pressure (HVLP) spray equipment means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Initial startup means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

Materials that contain HAP or *HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous parts and/or products means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street

cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

Paint stripping and/or miscellaneous surface coating source or facility means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Painter means any person who spray applies coating.

Plastic refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

Protective oil means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and laboratory activities means surface coating or paint stripping activities that meet one of the following criteria:

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

Solvent means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

Space Vehicle means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

Spray-applied coating operations means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Surface preparation or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Target HAP containing coating means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

Transfer efficiency means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

Truck bed liner coating means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

Regulatory Analysis:

The highlighted definitions in this section apply to applicable sections of this subpart that apply to the Trails West facility.

Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major	No	Subpart HHHHHH applies only to area

	sources		sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.

§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

Regulatory Analysis: *Trails west is subject to the highlighted requirements in accordance with § 63.11174*

APPENDIX C – RACT ANALYSIS FOR CACHE VALLEY TRAILER MANUFACTURING

RACT Determination for Trails West Horse Trailer Manufacturer, Preston
June 8, 2016 - Current non-attainment area, soon to become serios none attainment

	RACT
NOx	NG only, meet BRC (in the absences of any trailer painting reference)
PM2.5, Direct	Dry filtration, at least 98% efficiency, HVLP application 65% application efficiency(40 CFR 63, Part III, Vol. 73, No. 6
VOC	Use coatings with a VOC content of 5.7 lb/gal (less water and exempt compounds) or less, HVLP spray application,

	Technology feasible, but not cost effective
NOx	1) 0.012 lb/MMBtu, natural gas-fired with low NOx burner 2) 0.024 lb/MMBtu, natural gas-fired with low NOx bur
PM2.5, Direct	1) Electrostatic deposition; 2) Roller and dip application (A-Z Manufacturing, Madera) 3) Spray booth with exhaust
VOC	1)VOC capture and control system(4.2.1 C) 2)VOC capture and control system utilizing thermal/catalytic incinerati adsorption(Colonial Van and Storage, Fresno) 6) VOC capture and control system utilizing a thermal oxidizer; 7) Ca

Paints for proposed facility: P-2016.0008

Product Name	Type of Material Used	Type of Material Coated	Max Usage (gal/day)	Solid TAP/HAP Content (lb/gal)
106	Thinner	Metal	15.08461538	0.009492
130	Thinner	Metal	0.096153846	0
131S	Primer	Metal	0.046153846	39.292905
15303S	Activator	Metal	1.884615385	5.8146
15305S	Activator	Metal	5.192307692	5.7552
15307S	Activator	Metal	2.019230769	5.8014
15309S	Activator	Metal	0.711538462	7.4
15385S	Reducer	Metal	0.953846154	0
15395S	Reducer	Metal	0.230769231	0
15397S	Reducer	Metal	0.092307692	0
189S	Accelerator	Metal	0.259615385	0.021978
19301S	Blender	Metal	0.030769231	0.529935
226S	Solvent	Metal	0.007692308	0.084537
22806S	Solvent	Metal	0.069230769	0.257664
22880S	Primer	Metal	0.107692308	1.661778

Source	Refererence	Reference facility
EPA*	RBLC ID: TX-0772	Jefferson Railport Termial
EPA*	RBLC ID:OH-0309	Daimler Chrysler Corp., Toledo

*from WSV RACT developed by Bill Rogers

CA-SJV	4.2.3 B	Mobile Equipment Coating Operation - Multiple Location
CA-SJV	4.2.3 A	K.C. Paint, Inc -Multiple Location
CA-SJV	4.2.2 D	Beall Trailers of California, Inc (trailer painting)
CA-SJV	4.2.2 C	Colonial Van and Storage (trailer painting)
CA-SJV	4.2.2 B	Ray's Truck & Trailer Painting (trailer painting)
CA-SJV	4.2.2 A	Environmental Service Products (trailer painting)
CA-SJV	4.2.1 C	Automotive Paint Spraying Operation with/without Heater
CA-SJV	4.2.1 B	Naval Air Station, Lemoore
CA-SJV	4.2.1 A	Precision Collision Repair

CA-SJV	4.2.7 A	Advanced Industrial Coating, Inc Coating of computer, medical specialty, and aerospace metal part
CA-SJV	1.6.23 A	Tos Farms, Inc. Pistachio, almond, and walnut dryers (<10 MMbtu/hr; <2,880 hr/ (chosen because burner rating and usage)
CA	Permit 18402	Fleet Refinish, LLC Sacramento Motor Vehicle and Mobile Equipment Coating Spray Booth: <
UT	2012 RACT - Auto Refinish	Box Elder, Cache, Davis, Salt Lake,Tooele, Weber

APPENDIX D – PROCESSING FEE

Company:	**Trails West Idaho - Industrial Park**
Address:	**950 West Industrial Park Drive**
City:	**Preston**
State:	**ID**
Zip Code:	**83263**
Facility Contact:	**Jon Reeder**
Title:	**General Manager**
AIRS No.:	**041-00022**

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	0.9	0	0.9
SO_2	0.0	0	0.0
CO	0.1	0	0.1
PM10	0.3	0	0.3
VOC	35.9	0	35.9
TAPS/HAPS	9.7	0	9.7
Total:	46.9	0	**46.9**
Fee Due	**$ 5,000.00**		

Fee Amount (based on emisisons)
5000