Statement of Basis

Permit to Construct P-2010.0071
Project No. 0001

Permittee
Circle J Trainlers, Inc
Caldwell, Idaho

Facility ID No. 027-00064

FINAL

November 9, 2010
Robert Baldwin
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
Btu	British thermal units
CAA	Clean Air Act
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gph	gallons per hour
HAP	hazardous air pollutants
hr/yr	hours per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
SCL	significant contribution limits
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_X	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

Circle J Trailers Inc (Circle J) manufactures horse and utility trailers. Processes include welding, priming, painting, and composite fiberglass lay-up. Circle J was issued its initial Tier I operating permit on December 15, 2000 – Tier I Operating Permit No. 027-00067. Circle J is replacing the HVLP paint spray guns with electrostatic paint spray guns. The same fiber filters and carbon filters will be used to reduce PM_{10} and VOC emissions. The new electrostatic spray guns have a transfer efficiency of 80% replacing the HVLP spray guns with a 65% transfer efficiency. All painting will occur in paint booths.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

June 29, 2009	T1- 2009.0058, Tier I administrative amendment, change of ownership from Western World/Circle J Trailers to Circle J Trailers, Inc. (A)
September 22, 2005	T1-040040, Tier I operating permit renewal (S)
December 15, 2000	Initial Tier 1 operating permit for fiberglass roof manufacturing and painting operations (S)
April 30, 1999	PTC 027-00064, permitting of VOCs and TAPs emissions from fiberglass (bldg #2) processes including top coating sprayer and fiber sprayer, painting processes (bldg #1)setting the facility-wide limit for VOCs at 150 tons per year. (S)

Application Scope

This PTC is an initial PTC for the electrostatic spray guns.

The applicant has proposed to:

- Install and operate up to 5 electrostatic paint spray guns replacing the presently used HVPL paint spray guns
- Reduce the present VOC emissions from the painting to 27 tons per year
- Limits paint usage to 20,905 gallons per year
- Incorporates new paint booth limits into the Tier I operating permit renewal

Application Chronology

June 11, 2010	DEQ received an application and an application fee.
June 21, - July 6, 2010	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
June 18, 2010	DEQ determined that the application was incomplete.
July 26, 2010	DEQ received supplemental information from the applicant.
August 26, 2010	DEQ determined that the application was complete.
October 24, 2010	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 24, 2010	DEQ made available the draft permit and statement of basis for applicant review.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

ID No.	Source Description	Control Equipment Description	Emissions Point ID No. and Description
Prime Booth No. 1 **Paint Booth No. 1** **Prime Booth No. 2** **Paint Booth No. 2**	Emissions Unit Name: Electrostatic Air Spry Gun Manufacturer: Graco Model: 244404, umax 85kv Max. production: 7 gal/hr Transfer Efficiency: 80 %	Control Device Name: Manufacturer: Filtrair Model: FF-560 GX Control efficiency: 99 % for PM Manufacturer: Purolator Model: hi-E 40 CB Control efficiency: 35 % for VOC	Stack No. 4 Ambient Air Temp

Emissions Inventories

An emission inventory was developed for the combined booth's emissions with a combined paint usage of 20,905 gallons of paint product per year at the facility (see Appendix A) as associated with this proposed project. Emissions estimates of criteria pollutant PTE were based on emission factors from usage percentages and MSDS sheets of the various paint products used for an operation of 8,760 hours per year, and process information specific to the facility for this proposed project. Summaries of the estimated uncontrolled and controlled emissions of criteria pollutants, TAPs, and HAPs from the facility are provided in the following tables. The calculations in Appendix A do not include the 25% flexibility factor for variations in paint product.

Pre-Project Potential to Emit

The following table presents the pre-project potential to emit for all criteria pollutants from the four paint booths (bldg #5) at the facility as submitted by the applicant and verified by DEQ staff. These emissions are based on the 20,905 gallons of paint product used in a year as specified in the facility's application before controls. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit. The calculations in Appendix A do not include the 25% flexibility factor for variations in paint product.

Before this project Circle J used HVLP spray guns with a transfer efficiency of 65%. Thus the potential to paint the same objects would increase the paint usage by 15%. The control filters and carbon filter would be the same in the pre-project and post project determinations. The emissions stated in the table below are determined by use of the HVLP spray guns and 24,040 gallons of paint usage. Since the particulate filters and carbon filters were already permitted when the HVLP spray guns were permitted, the control efficiency of the control devices are allow to reduce the pre-project potential to emit emissions for the criteria pollutants.

Table2 PRE-PROJECT POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS[c]

Emissions Unit	PM_{10} T/yr[b]	VOC T/yr[b]
HVLP spray guns in all four painting areas and 24040 gallons of paint per year with particulate filters and carbon filters	2.68	33.65
Pre-Project Totals	2.68	33.65

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.
c) The PM_{10} and VOC emissions in this table are only the emissions for the four paint booths.

Post Project Potential to Emit

The following table presents the post project potential to emit for criteria pollutants from new emissions units at the facility as submitted by the applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit. The calculations in Appendix A do not include the 25% flexibility factor for variations in paint product.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS[c]

Emissions Unit	PM_{10} T/yr[b]	VOC T/yr[b]
Point Sources		
Prime Booth No1, Paint Booth No1, Prime Booth No.2, and Paint Booth No.2 combined (5 electrostatic spray guns at 7 gallons/hour using 20905 gal/yr paint with fiber filters at 90% efficiency for PM_{10} and carbon filters with 35 % efficiency and a 25% flexibility factor)	1.07	27.1
Post Project Totals	1.07	27.1

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.
c) The PM_{10} and VOC emissions in this table are only the emissions for the four paint booths

As demonstrated in Table 2 and Table 3, this facility has uncontrolled potential to emit for Pollutant (i.e., VOC, PM_{10}, ...) emissions less than the Major Source threshold of 100 T/yr and a controlled potential to emit for Pollutant (i.e., VOC, PM_{10}, ...) emissions less than the Major Source threshold of 100 T/yr. However, this facility has a Tier I operating permit (including other emissions units) with a facility-wide emission limit for VOCs of 150 tons per year. Thus the facility is designated a class A source.

Change in Potential to Emit

The change in this permitting action potential to emit is used to determine if a public comment period may be required or if emissions modeling may be required, and to determine the processing fee in accordance with IDAPA 58.01.01.225. The following table presents the permitting action change in the potential to emit for criteria pollutants for this permitting action.

Table 4 CHANGES IN POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

	PM_{10} T/yr	VOC T/yr
Point Sources		
Pre-Project Potential to Emit	2.68	33.65
Post Project Potential to Emit	1.07	27.1

Comparison of the Project Emissions Increase to the PSD Significance Thresholds

The comparison of the change in projected actual emissions from baseline actual emissions to the PSD significance thresholds for this permitting action is presented in the following table.

Table 5 COMPARISON OF THE PROJECT EMISSIONS INCREASE TO THE PSD MAJOR MODIFICATION THRESHOLDS

Emissions	PM_{10} T/yr	SO_2 T/yr	NO_X T/yr	CO T/yr	VOC T/yr
Point Sources					
Project Emissions Increase	**(1.61)**	0.0	0.0	0.0	**(6.55)**
PSD Significance Threshold	**15**	**40**	**40**	**100**	**40**
Does the Project Emissions Increase Exceed the PSD Major Modification Threshold?	No	No	No	No	No

As presented in the preceding table this project does not constitute a PSD Major Modification and is not subject to PSD permitting requirements.

Non-Carcinogenic and Carcinogenic TAP Emissions

The summary for all the TAPs emissions are located in appendix A (Emissions Inventory). The spreadsheet indicates that combine emissions of TAPs for the limit of 20,905 gallons per year is approximately 8.32 tons per year. This emission rate is below both the 10 ton per year of a single HAPs and 25 ton per year combined HAPs requirement to make the facility a major facility. This low rate of combined emissions inherently indicates the EL of any particular TAPs and HAPs emissions are not exceeded.

Ambient Air Quality Impact Analyses

This permitting action is for the project of removing HVLP spray guns for higher efficiency electrostatic spay gun. This project has a net reduction of emissions from the four paint booths. Since the emission rate is reduced and the other physical parameters of the paint booths remain unchanged (stack height, stack diameter, exhaust flow rate, and filtration system) the need for the emissions to be remodeled is not required. This project is below applicable screening emission levels (EL) and the published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline. Refer to the Emissions Inventories section for additional information concerning the emission inventories. Analysis for TAPs is provided in Appendix A.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

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

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee had requested that a PTC be issued to the facility for the installation of electrostatic spray guns for the painting process. Therefore, a permit to construct is 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.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM_{10} emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 7.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

The PTE for this permitting action with the 25% flexibility in emissions is 27 tons per year of VOCs. The facility has a Tier I operating permit that has a facility-wide VOC limit of 150 tons per year, which includes other emissions units at the facility. Thus Circle J Trailers, Inc's classification is a major source as defined in IDAPA 58.01.01.008.10. The facility requested in this PTC permit application that upon issuance of the PTC the facility's Tier I operating permit will be amended to reflect the change in operations.

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.

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 is not subject to any MACT standards in 40 CFR Part 63. Circle J has stated in the application no paint with the compounds in HHHHHH shall be used at the facility. Circle J has stated in the permit application that an exemption to HHHHHH will be acquired from EPA and maintained at the site for review.

Permit Conditions Review

This section describes the permit conditions of this initial permit for the paint booths using electrostatic spray guns.

Permit Condition 6

Establishes the emission limits of PM_{10} and VOCs released from usage of 20,905 gallons annually of paint product. The application stated the various products used were for a total of 901 gallons for the previous year. The analysis of paints submitted with the application were prorating to the quantity of the permitted limit 20,905 gallons per year including a 25% emissions increase for flexibility of variations of paints used to determined the PM_{10} and VOCs emissions limit.

Permit Condition 7

Establishes the requirement for the opacity of the exhaust from stack No. 4 which is the exhaust from all four paint booths. With the filtration system under proper maintenance, the facility should stay below the 20% opacity limit.

Permit Condition 8

Establishes the method for the facility to determine compliance with IDAPA 58.01.01.585 and to ensure the emissions from these compounds are below any thresholds within IDAPA 58.01.01.585. The factor 0.006 was determined by taking a normalized concentration for a 1 pound per hour emission in ug/m^3 per lb/hr and converting the value to mg/m^3 per lb/day value.

Permit Condition 9

Establishes the method for the facility to determine compliance with IDAPA 58.01.01.586 and to ensure the emissions from these compounds are below any thresholds within IDAPA 58.01.01.586. The factor 0.92 was determined by taking a normalized concentration for a 1 pound per hour emission in ug/m^3 per lb/hr for an annual average and converting the a lb/day per ug/m^3 value.

Permit Condition 10

Establishes the limit of paint usage for the facility to determine compliance with the emissions from 20,905 gallons of paint per year (PC 6).

Permit Condition 11

Establishes the methods through a developed O & M manual to determine compliance the filtration system is in good working condition.

Permit Condition 12

Establishes the monitoring of the pressure drop across the filters. This monitoring shall be included in the developed O & M manual. The readings are to be recorded and presented to a DEQ representative upon request to demonstrate compliance with maintenance of good working condition of the filtration system (PC11).

Permit Condition 13

Establishes the procedure including changing of the filters within the O & M manual to determine compliance with good working conditions of the filtration system (PC11).

Permit Condition 14

Establishes the method the facility shall use to determined compliance with IDAPA 58.01.01.585 emissions levels of compounds and the facility emissions of these compounds are below any thresholds (PC8).

Permit Condition 15

Establishes the method the facility shall use to determined compliance with IDAPA 58.01.01.586 emissions levels of compounds and the facility emissions of these compounds are below any thresholds (PC9).

Permit Condition 16

Establishes monitoring and recording of the filtration system to determine compliance with the good working conditions stated in Permit Condition 11.

Permit Condition 17

Establish the calculations and recordings of VOCs to determine compliance with Permit Condition 6. This calculation shall be on a monthly and yearly basis to determine compliance with Permit Conditions 18 and 19.

Permit Condition 18

Establishes the method used to determine compliance with the monthly VOC calculation to determine compliance with Permit Condition 17.

Permit Condition 19

Establishes the method used to determine compliance with the annual VOC calculation to determine compliance with Permit Condition 17. Establishes the method used to determine compliance with the annual paint product limit to demonstrate compliance with Permit Condition 10.

Permit Condition 20

Establishes the monitoring and recording of daily usage of each non-carcinogenic and carcinogenic, if applicable, TAP-containing product to demonstrate compliance with the product usage limit established Permit Condition 10. The daily product usage shall be recorded. Records shall include an explanation of the calculation methods as well as a sample calculation.

Permit Condition 21

Established all monitoring and recordkeeping used to determine compliance with General Provision No. 30.

General Permit Condition 22

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.

General Permit Condition 23

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.

General Permit Condition 24

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.

General Permit Condition 25

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

General Permit Condition 26

The construction and operation notification provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.

General Permit Condition 27

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.

General Permit Condition 28

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.

General Permit Condition 29

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.

General Permit Condition 30

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.

General Permit Condition 31

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130.

General Permit Condition 32

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

General Permit Condition 33

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

General Permit Condition 34

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

General Permit Condition 35

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 36

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 or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. The public comment opportunity dates were from June 21, 2010 to July 6, 2010.

APPENDIX A – EMISSIONS INVENTORIES

Potential emission at maximum usage 306600 gal /yr, Potential emissions at permitted usage 20905 gal.yr

							20905 gal		20905 gal				
	Gallons limited by declared amouint PM-10 is reduces by filters	Total Gallons Used	Density lbs/gal	VOC lbs/gal	% of paint type used	Total gals of 20905 Projected gal/yr	Maximum Yearly VOCs lbs	Solid lbs/gal	Maximum yearly solids lbs	estimated HAPS lb/gal	HAPS lb/yr	Potential 306600 Solids lb/yr	Potenial 306600 VOC lb/yr
760B789S	Gloss Black Low Haps Acrylic	160	8.35	4.04	0.163	3.4E+03	1.4E+04	4.31	1.5E+04	0.51	1.7E+03	2.2E+05	2.0E+05
UER1000S	Retarder	3	7.83	7.83	0.003	6.4E+01	5.0E+02	0	0.0E+00	7.83	5.0E+02	0.0E+00	7.3E+03
UER6590S	Medium Urethane/Epoxy Reducer	110	7.35	7.35	0.112	2.3E+03	1.7E+04	0	0.0E+00	0.78	1.8E+03	0.0E+00	2.5E+05
UERX01S	Fast Exempt Reducer	218	6.59	0	0.222	4.6E+03	0.0E+00	6.59	3.1E+04	0	0.0E+00	4.5E+05	0.0E+00
VGPT08D00	Undercoating	134	7.02	4.7	0.137	2.9E+03	1.3E+04	2.32	6.6E+03	0.82	2.3E+03	9.7E+04	2.0E+05
VP55GPS	Gray High Solids Epoxy Primer	169	12.73	3.28	0.163	3.4E+03	1.1E+04	9.45	3.2E+04	1.16	4.0E+03	4.7E+05	1.6E+05
VPC50F01	Low VOC Epoxy Activator	105	8.04	1.75	0.107	2.2E+03	3.9E+03	6.29	1.4E+04	1.05	2.3E+03	2.1E+05	5.7E+04
354X187S	Low Haps Primer Sealer*	67	11.8	3.4	0.068	1.4E+03	4.9E+03	8.4	1.2E+04	2.025	2.9E+03	1.8E+05	7.1E+04
CEC0056	Epoxy Primer Curing Agent*	2	8.06	3.49	0.002	4.3E+01	1.5E+02	4.57	1.9E+02	2.025	8.6E+01	2.9E+03	2.2E+03
EEA 132	R-Cure 200 Primer 1E2732D Gray F D Epoxy*	12	12.05	3.59	0.012	2.6E+02	9.2E+02	8.46	2.2E+03	2.025	5.2E+02	3.2E+04	1.3E+04
760W759S	Low Haps Linen White Acrylic*	10	10.57	3.64	0.010	2.1E+02	7.8E+02	6.93	1.5E+03	2.025	4.3E+02	2.2E+04	1.1E+04
	Total gallons used in 2009	981	9.126364	4.307	average VOC lb/gal			6.36889	solids	2.025	1.7E+04	1.7E+06	9.8E+05
	Projected annual gallons yearly					**20905**			lb/gal			306600	306600
	Maximum Yearly VOC (lbs) uncontrolled						6.7E+04				16640.78	lbs of HAP for 20905gal	
	Maximum Yearly VOC (tons) uncontrolled						33.36				8.32	T of HAPs fir 20905 gal	
	VOCs emissions reduced 35% by carbon filters						**21.68**				below Major facility		
	Total possible pounds if all emits to atmoshpere uncontrolled								1.1E+05				
	Total possible tons if all emits to atmoshpere uncontrolled								57.03	tons/yr			
	Solids reduced 85 % by spray guns (85 % transfer eff)								8.55	tons/yr			
	Solids emissions reduced an additional 90% by particulate filters								0.86	**tons/yr**			
	MAX Potential 5 guns 7 gal/hr 8760hr/yr withonly transfer eff (lbs)											**2.51E+05**	
	MAX Potential 5 guns 7 gal/hr 8760hr/yr withonly transfer eff (tons)											**125.46**	
	With particulate filters at 90% efficiency (tons/yr)										emissions	**12.55**	
	Max Potenital for VOC uncontrolled												**489.28**
	Max Potential for VOC with carbon filters 35% efficiency												**318.03**

24040 gallons required by HVLP spray guns (percent of tranfer difference)

HAPs potenital 20905 gallons paint annually

*HAPs estimated as an arimetic average of the six compounds above the 2.025 lb/gal

		VOC	PM_{10}
Uncontolled	HVLP spray guns with 24040 gal /yr sprayed at an aerage 4.307 lb/gal VOCs	51.77014 T/yr	26.793916 T/yr Solids
Controlled	HVLP spray guns with 24040gal /yr sprayed at an aerage 4.307 lb/gal VOCs	33.65 T/yr	2.68 T/yr Solids

LIST OF POLLUTANTS OBTAINED FROM THE MSDS SHEETS FOR TAPS AND HAPS.

CAS Number	Chemical Name	Weight %	OEL (mg/m3)	EL (lb/hr)	AAC (mg/m3)	Carcinogen?	Emission Limit (lbs/yr)
95-63-6	1,2,3-Trimethylbenzene	7.56	n/a	n/a	n/a	No	n/a
108-67-8	1,3,5-Trimethylbenzene	0.01	n/a	n/a	n/a	No	n/a
96-29-7	2-Butanone oxime	0.34	n/a	n/a	n/a	No	n/a
70657-70-4	2-Methoxy-1-Acetoxy propane	<0.01	n/a	n/a	n/a	No	n/a
19549-80-5	4,6-Dimethylheptan-2-One	0.01	n/a	n/a	n/a	No	n/a
67-64-1	Acetone	5	1780	119	89	No	14833
122-99-6	Aromatic Glycol Ether	0.02	n/a	n/a	n/a	No	n/a
64742-94-5	Aromatic Naphtha, Heavy	0.54	n/a	n/a	n/a	No	n/a
64742-95-6	Aromatic Naphtha, Light	15.3	n/a	n/a	n/a	No	n/a
100-51-6	Benzyl Alcohol	20.8	n/a	n/a	n/a	No	n/a
123-86-4	Butyl Acetate	21.2	710	47.3	35.5	No	5916.7
98-82-8	Cumene	0.26	245	16.3	12.25	No	2041.7
112-34-5	Diethylene Glycol Butyl Ether	<0.01	n/a	n/a	n/a	No	n/a
108-83-8	Diisobutyl Ketone	0.01	145	9.67	7.25	No	1208.3
67-64-1	Dimethyl Ketone-Exempt Sovent	100	n/a	n/a	n/a	No	n/a
64-17-5	Ethanol	8.35	1880	125	94	No	15667
763-69-9	Ethyl 3-Ethoxypropionate	29.9	n/a	n/a	n/a	No	n/a
100-41-4	Ethylbenzene	2.23	435	29	21.75	No	3625
111-76-2	Ethylene Glycol Monobutyl Ether	0.13	n/a	n/a	n/a	No	n/a
112-07-2	Ethylene Glycol Monobutyl Ether Acetate	100	n/a	n/a	n/a	No	n/a
142-82-5	Heptane	45	1640	109	82	No	13667
78-83-1	Isobutyl Alcohol	0.02	150	10	6	No	1000
67-63-0	Isopropyl Alcohol	5	980	65.3	49	No	81.667
67-56-1	Methyl Alcohol	0.03	n/a	n/a	n/a	No	n/a
78-93-3	Methyl Ethyl Ketone	15.5	590	39.3	29.5	No	4916.7
108-10-1	Methyl Isobutyl Ketone	0.34	205	13.7	10.25	No	1708.3
110-43-0	Methyl N-Amyl Ketone	11.1	235	15.7	11.75	No	1958.3
64742-47-8	Mineral Spirits	0.06	n/a	n/a	n/a	No	n/a
64741-65-7	Mineral Spirits, Odorless	7.53	n/a	n/a	n/a	No	n/a
64742-88-7	Naphtha	0.05	n/a	n/a	n/a	No	n/a
91-20-3	Naphthalene	0.06	50	3.33	2.5	No	416.7
71-36-3	N-butyl Alcohol	21.8	150	10	7.5	No	1250
121888-66-2	Organophilic Clay	15	n/a	n/a	n/a	No	n/a
98-56-6	Para-Chlorobenzotrifluoride	3.18	n/a	n/a	n/a	No	n/a
8052-41-3	Petroleum Distillates	10	n/a	n/a	n/a	No	n/a
108-65-6	Propyleneglycol Monomethyl Ether Acetate	0.16	n/a	n/a	n/a	No	n/a
14808-60-7	Silica, Crystalline	1	0.1	0.01	0.005	No	0.83
108-88-3	Toluene	9.77	375	25	18.75	No	3125
25551-13-7	Trimethylbenzene	0.06	123	8.2	6.15	No	1025
1330-20-7	Xylene	15	435	29	21.75	No	3625
7779-90-0	Zinc Phosphate	5	n/a	n/a	n/a	No	n/a

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

The emissions are below the prior permitted emission and no modeling was required.

APPENDIX C – FACILITY DRAFT COMMENTS

No comments were received during the opportunity for comment period.

APPENDIX D – PROCESSING FEE

Company:	**Circle J Trailers, Inc.**
Address:	**312 W. Simplot Blvd**
City:	**Caldwell**
State:	**Idaho**
Zip Code:	**83605**
Facility Contact:	**Rick Bowman**
Title:	**General Manager**
AIRS No.:	**027-00064**

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	0.0	0	0.0
SO_2	0.0	0	0.0
CO	0.0	0	0.0
PM10	1.0	0	0.0
VOC	27.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	**28.0**
Fee Due	**$5,000.00**		