COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

ISSUE DATE: 18-JAN-01

EFFECTIVE DATE: 18-JAN-01

EXPIRATION DATE: 31-DEC-05

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960,P.L.2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V PERMIT NO: 59-00001
TAX-ID/PLANT CODE 23-2229424/01

OWNER WESTFIELD TANNING CO MAILING 360 CHURCH STREET ADDRESS WESTFIELD, PA. 16950

PLANT WESTFIELD PLT LOCATION 59 Tioga County

59939 Westfield Boro

SIC CODE 3111 Manufacturing - Leather Tanning And Finishing

RESPONSIBLE OFFICIAL

NAME

KEITH A KRAUS

TITLE

PLANT SUPERINTENDENT

PERMIT CONTACT PERSON

NAME

KEITH A KRAUS

TITLE

PLANT SUPERINTENDENT

PHONE

(814)367 - 5951

[SIGNATURE]

DAVID W ALDENDERFER, NORTHCENTRAL REGION AIR PROGRAM MANAGER

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General Title V Requirements

#001 Definitions

#002 Property Rights

#003 Permit Expiration

#004 Permit Renewal

#005 Transfer of Ownership or Operational Control

#006 Inspection and Entry

#007 Compliance Requirements

#008 Need to Halt or Reduce Activity Not a Defense

#009 Duty to Provide Information

#010 Reopening and Revising the Title V Permit for Cause

#011 Reopening a Title V Permit for Cause by EPA

#012 Significant Operating Permit Modifications

#013 Minor Operating Permit Modifications

#014 Administrative Operating Permit Amendments

#015 Severability Clause

#016 Fee Payment

#017 Authorization for De Minimis Emission Increases

#018 Reactivation of Sources

#019 Circumvention

#020 Submissions

#021 Sampling, Testing and Monitoring Procedures

#022 Recordkeeping Requirements

#023 Reporting Requirements

#024 Compliance Certification

#025 Operational Flexibility

#026 Risk Management

#027 Approved Economic Incentives and Emission Trading Programs

#028 Permit Shield

Section C. Site Level Requirements

C-I: Restrictions

C-II: Testing Requirements

C-III: Monitoring Requirements

C-IV: Recordkeeping Requirements

C-V: Reporting Requirements

C-VI: Work Practice Standards

C-VII: Additional Requirements

C-VIII: Compliance Certification

C-IX: Compliance Schedule

Section D. Source Level Requirements

SECTION A. TABLE OF CONTENTS

01/18/01 PAGE: 59-00001

D-I: Restrictions

D-II: Testing Requirements

D-III: Monitoring Requirements

D-IV: Recordkeeping Requirements

D-V: Reporting Requirements

D-VI: Work Practice Standards

D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

Section E. Alternative Operating Scenario(s)

E-I: Restrictions

E-II: Testing Requirements

E-III: Monitoring Requirements

E-IV: Recordkeeping Requirements

E-V: Reporting Requirements

E-VI: Work Practice Standards

E-VII: Additional Requirements

Section F. Emission Trading Groups

Section G. Emission Restriction Summary

Section H. Miscellaneous

1D 035	Source Name 750HP JOHNSTON BOILER #1		Capacity 31.6 MMBTU/HF 31.6 MMBTU/HF	U/HR	Natural Gas	
036	750HP JOHNSTON BOILER #2		31.6 MMBTU/HR 31.6 MMBTU/HR		Natural Gas	Gas
101 102 201 202 203 205 206	LEATHER WATERPROOFING/DYEING OPERAT LEATHER TANNING OPERATION DEGREASING OPERATION KEROSENE CLEANING LEATHER SPLITTING SPONGE SOLUTION FUNGICIDE LEATHER T HARNESS&SOLE LEATHER DYEING&TREATIN C.E.ROGERS RETAN BOX DRYER		31.0 THD1	O7 File	π Ζ 011	
209 211	FUEL OIL STORAGE TANK CONDENSED LIQUID STORAGE TANKS				#2 0il	
213 214 C206	MISCELLANEOUS STORAGE TANKS LEATHER FINISHING OPERATION INTEGRAL FABRIC COLLECTOR					
FM01 FM02	NATURAL GAS LINE #2 FUEL OIL					
S03 S04	BOILER #1 STACK BOILER #2 STACK					
S206 S215	FABRIC COLLECTOR EXHAUST SPRAY BOOTH EXHAUSTS					
Z01 Z02	WATERPROOFING EMISSIONS TANNING EMISSIONS					
Z201 Z202 Z203 Z205	DEGREASING EMISSIONS KEROSENE CLEAN EMISSIONS SPONGE SOLUTION EMISSIONS DYING &TREATING EMISSIONS					•
Z209 Z211	FUEL OIL EMISSIONS CONDENSD LIQUID EMISSIONS		÷ .			
Z213	STORAGE TANK EMISSIONS					
FML FM02>						
FML Comb EP						
FM01>035>S03						

FML FM02>						
FML FMC	 Comb EP Comb = ->S04					

Proc EP 101 -->Z01 Proc EP 102 -->Z02 Proc EP 201 -->Z201 Proc EP 202 -->Z202 Proc EP 203 -->Z203 Proc EP 205 -->Z205 Proc CD 206 -->C206 -->S206 EP Proc 209 --->Z209 Proc EP 211 -->Z211

7

8

#001 [25 Pa. Code § 121.1] Definitions

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.512(c)(4)]
Property Rights

This permit does not convey property rights of any sort, or any exclusive privileges.

#003 [25 Pa. Code § 127.446(a) and (c)]
Permit Expiration

This permit is issued for a fixed term of five (5) years from the effective date shown on Page 2 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]
Permit Renewal

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#005 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)] Transfer of Ownership or Operational Control

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
- (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] Inspection and Entry

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)] Compliance Requirements

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
 - (1) Enforcement action
 - (2) Permit termination, revocation and reissuance or modification
 - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air

contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.512(c)(2)] Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]
Duty to Provide Information

- (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542] Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration

of the permit under one or more of the following circumstances:

- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The permit revision shall be completed within 18 months after promulgation of the applicable requirement. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#011 [25 Pa. Code § 127.543] Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

13

#012 [25 Pa. Code § 127.541] Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

#013 [25 Pa. Code §§ 121.1 & 127.462] Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450] Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)] Severability Clause

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

#016 [25 Pa. Code §§ 127.704, 127.705 & 127.707] Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient AIr Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§ 127.14(b) & 127.449] Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions

increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquified petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
- (5) Laboratory equipment used exclusively for chemical or physical analysis.
- (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215] Reactivation of Sources

- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisifies the conditions specified in 25 Pa. Code § 127.11a(b).

#019 [25 Pa. Code §§ 121.9 & 127.216] Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air

contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)] Submissions

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager PA Department of Environmental Protection (At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement Programs Section (3AT13) United States Environmental Protection Agency Region 3 1650 Arch Street Philadelphia, PA 19103-2029

- (c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d).
- (d) Unless otherwise required by the Clean Air Act or regulations adopted thereunder, a responsible official of the facility shall certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

#021 [25 Pa. Code § 127.441(c) & Chapter 139; §§ 114(a)(3), 504(b) of the CAAJ Sampling, Testing and Monitoring Procedures

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135] Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
- (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be

kept to provide the needed information by indirect means.

#023 [25 Pa. Code §§ 127.411(d), 127.442 & 127.511(c)] Reporting Requirements

- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513] Compliance Certification

(a) Within one (1) year from the date of issuance of the Title V permit and each year thereafter, the permittee shall submit to the Department and EPA Region III a certification of compliance with the terms and conditions in this permit including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
 - (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be submitted to the Department and EPA in accordance with the submission requirements specified in Condition #020 of this section.

#025 [25 Pa. Code § 127.3] Operational Flexibility

- (a) The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:
 - (1) Section 127.14 (relating to exemptions)
 - (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
 - (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
 - (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)
- (b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68] #026 Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall prepare and implement the RMP according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) June 21, 1999;
- (ii) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (iii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the

certification required under this permit, the permittee shall:

- (1) Submit a compliance schedule for satisfying the requirements 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)] Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)] Permit Shield

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
- (1) The applicable requirements are included and are specifically identified in this permit.

- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
- (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
- (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.
- (d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person may permit the emission into the outdoor atmosphere of fugitive air contaminants from a source other than the following:

- (1) Construction or demolition of buildings or structures
- (2) Grading, paving and maintenance of roads and streets
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) Sources and classes of sources other than those identified above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
- (a) The emissions are of minor significance with respect to causing air pollution.
- (b) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

#002 [25 Pa. Code §123.2]

Fugitive particulate matter

No person may permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Condition #001 if the emissions are visible at the point the emissions pass outside the person's property.

#003 [25 Pa. Code §123.31]

Limitations

No person may permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

#004 [25 Pa. Code §123.41]

Limitations

No person may permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

#005 [25 Pa. Code §123.42]

Exceptions

The emission limitations of 25 Pa. Code Section 123.41 shall not apply when:

- (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;
- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (3) The emission results from sources specified in 25 Pa. Code Section 123.1(a)(1)-(9).

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The total emission of any hazardous air pollutant (HAP), as defined in Section 112(b) of Title III of the Clean Air Act, into the outdoor atmosphere from the entire facility shall not equal or exceed 10 tons during any 12 consecutive month period.
- (b) The total emission of all hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, into the outdoor atmosphere from the entire facility shall not equal or exceed 25 tons during any 12 consecutive month period.

II. TESTING REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) At least sixty (60) days prior to the performance of the stack testing required by this permit, a test plan shall be submitted to the Department for evaluation. The plan shall contain a description of the proposed test methods and dimensioned drawings or sketches showing the test port locations.
- (b) The Department shall be given at least fourteen (14) days advance notice of the scheduled dates for the performance of the stack testing required by this permit.
- (c) Within sixty (60) days of the completion of the stack tests required by this permit, two copies of the test report shall be submitted to the Department. This report shall contain the results of the tests, a description of the testing and analytical procedures actually used in performance of the tests, all process and operating data collected during the tests, a copy of all raw data, and a copy of all calculations generated during data analysis.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall perform tests (in accordance with the provisions of 25 Pa. Code Chapter 139) or provide a fuel certification report of the percent sulfur by weight of each delivery of #2 or lighter fuel oil.

OR

The permittee shall keep records of fuel certification reports obtained yearly from the fuel oil supplier stating that the sulfur percentage for each shipment of fuel delivered to the facility during the year shall not exceed 0.5% sulfur by weight for #2 or lighter fuel oil.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall conduct tests which demonstrate through Method 24 of 40 CFR Part 60 and 25 Pa. Code Chapter 139 of the volatile organic compound (VOC) content of each dipping compound, dyeing material, finishing material and solvent used at the facility.

OR

The permittee shall maintain documentation from the supplier/manufacturer (e.g. certified product data sheets) which certifies the volatile organic compound (VOC) content of each dipping compound, dyeing material, finishing material and solvent used at the facility.

#010 [25 Pa. Code §139.1]

Sampling facilities.

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such source. The Department will set forth, in the request, the time period in which the facilities shall be provided as well as the specifications for such facilities.

#011 [25 Pa. Code §139.11]

General requirements.

- (a) As specified in 25 Pa. Code Section 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) As specified in 25 Pa. Code Section 139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, as a minimum, all of the following:
- (1) A thorough source description, including a description of any air cleaning devices and the flue.
- (2) Process conditions, for example, the charging rate of raw material or rate of production of final product, boiler pressure, oven temperature and other conditions which may effect emissions from the process.

- (3) The location of sampling ports.
- (4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage of CO, CO2, O2 and N2), static and barometric pressures.
- (5) Sample collection techniques employed, including procedures used, equipment descriptions and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
- (6) Laboratory procedures and results.
- (7) Calculated results.

III. MONITORING REQUIREMENTS.

#012 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall conduct a weekly inspection of the facility during daylight hours while the facility is operating to detect visible emissions, visible fugitive emissions and malodors. Weekly inspections are necessary to determine:
- (1) The presence of visible emissions.
- (2) The presence of visible fugitive emissions.
- (3) The presence of malodors beyond the boundaries of the facility.
- (b) All detected visible emissions, visible fugitive emissions or

malodors that have the potential to exceed applicable limits shall be reported to the manager of the facility.

IV. RECORDKEEPING REQUIREMENTS.

#014 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall maintain a logbook of the facility inspections performed. The logbook shall include the name of the company representative performing the inspection, the date and time of inspections, any instances of exceedances of visible emissions limitations, visible fugitive emissions limitations and malodorous air emissions limitations, and the name of the manager informed if a potential exceedance is observed. The permittee shall also record any and all corrective action(s) taken to abate each recorded deviation to prevent future occurrences.
- (b) These records shall be retained for a minimum of 5 years and shall be made available to the Department upon request.

#015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the fuel test reports or the fuel certification reports used to verify compliance with the percent sulfur limitation for # 2 or lighter fuel oil. These records shall be retained for a minimum of 5 years and shall be made available to the Department upon request.

#016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the calculations used to verify compliance with the 'any HAP' annual emissions limitation and the 'combined HAPs' annual emissions limitation for the entire facility. These records shall be retained for a minimum of five (5) years and shall

be made available to the Department upon request.

#017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the tests conducted or documentation from the supplier/manufacturer (e.g. certified product data sheets) which certifies the volatile organic compound (VOC) content of each dipping compound, dyeing material, finishing material and solvent used at the facility. These records shall be retained for a minimum of 5 years and shall be made available to the Department upon request.

#018 [25 Pa. Code §135.5]

Recordkeeping

The permittee shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 25 Pa. Code Section 135.3 (relating to reporting). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. These records shall be retained for at least five years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on a semi-annual basis that include the supporting calculations used to verify compliance with the 'any HAP' annual emissions limitation and the 'combined HAPs' annual emissions limitation from the entire facility.
- (b) The semi-annual reports shall be submitted to the Department by no later than: September 1 for the preceding January 1-June 30 time period and March 1 for the preceding July 1-December 31 time period.

#020 [25 Pa. Code §127.442]

Reporting requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall report malfunctions which occur at this facility to the Department. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner that may result in an increase in the emissions of air contaminants. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- (b) Failures that are caused in part by poor maintenance or careless operation shall be reported as excess emissions or deviations from this permit's requirements.
- (c) When the malfunction, excess emissions or deviation from this permit's requirements poses an imminent and substantial danger to the public health and safety or environment, the permittee shall notify the Department by telephone no later than one (1) hour after the incident.
- (d) Any malfunction, excess emissions or deviation from this permit's requirements that is not subject to the notice requirements of subsection (c) of this permit condition shall be reported to the Department within twenty-four (24) hours of discovery. In notifying the Department, the permittee shall describe the following:
- (i) name and location of the facility;
- (ii) nature and cause of the malfunction or breakdown;
- (iii) time when the malfunction or breakdown was first observed;
- (iv) expected duration of excess emissions;
- (v) estimated rate of emissions; and
- (vi) corrective actions or preventative measures taken.
- (e) The permittee shall notify the Department immediately when corrective measures have been accomplished.
- (f) Upon the request of the Department, the permittee shall submit a full written report to the Regional Air Program Manager within fifteen (15) days of the malfunction, excess emissions or deviations from this permits requirements.

#021 [25 Pa. Code §135.3] Reporting

- (a) A person who owns or operates a source to which 25 Pa. Code Chapter 135 applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year an Annual Air Information Management Systems (AIMS) Emissions report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.
- (b) A person who receives initial notification by the Department that a Annual Air Information Management Systems (AIMS) Emissions report is necessary, shall submit an initial Annual Air Information Management Systems (AIMS) Emissions report within sixty (60) days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.
- (c) The permittee may request an extension of time from the Department for the filing of a Annual Air Information Management Systems (AIMS) Emissions report, and the Department may grant the extension for reasonable cause.

#022 [25 Pa. Code §135.21] Emission statements

- (a) The permittee shall provide the Department with a statement of each stationary source in a form as prescribed by the Department, showing the actual emissions of oxides of nitrogen and volatile organic compounds (VOCs) from the permitted facility for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based.
- (b) The annual emission statements are due by March 1 for the preceding calendar year and shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate. The Emission Statement shall provide data consistent with requirements and guidance developed by the EPA.
- (c) The Department may require more frequent submittals if the Department determines that one or more of the following applies:
- (1) A more frequent submission is required by the EPA.
- (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the Air Pollution Control Act.

VI. WORK PRACTICE STANDARDS.

Prohibition of certain fugitive emissions

For any source specified in 25 Pa. Code Section 123.1 subsections (a)(1)-(7) or (a)(9), the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.
- (2) Application of asphalt, oil, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

VII. ADDITIONAL REQUIREMENTS.

#024 [25 Pa. Code §129.14]

Open burning operations

No person may permit the open burning of material at this facility unless in accordance with 25 Pa. Code Section 129.14.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** PERMIT SHIELD IN EFFECT. ***

Source ID: 035

Source Name: 750HP JOHNSTON BOILER #1

SOURCE CAPACITY:

31.6 MMBTU/HR Natural Gas 31.6 MMBTU/HR #2 011

FML FM02 --> |
FML | Comb EP |
FM01 -->035 -->S03

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §123.11]

Combustion units

No person may permit the emission from Source ID 035 into the outdoor atmosphere of particulate matter in excess of 0.40 pound per million Btu of heat input.

#002 [25 Pa. Code §123.22]

Combustion units

[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provision in 40 CFR 52.2020(c)]

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from Source ID 035 in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The total combined potential to emit VOCs from Source IDs 035 and 036, shall not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any 12 consecutive month period. Should any of these VOC emissions limitations ever be exceeded, a detailed RACT analysis which meets the criteria specified in 25 Pa. Code Section 129.92 must be submitted to the Department for Source IDs 035 and 036.

#004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.42c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Standard for sulfur dioxide.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Standard for sulfur dioxide requirements as set forth in 40 CFR §60.42c.

#005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.43c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Standard for particulate matter.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

- (a) Source ID 035 shall comply with all applicable Standard for particulate matter requirements set forth in 40 CFR §60.43c.
- (b) The permittee shall not cause to be discharged into the atmosphere from Source ID 035 any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standards under 40 CFR §60.43c apply at all times, except during periods of startup, shut-down, or malfunction.

Fuel Restriction(s).

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 035 is to be fired only on gas (natural or LP) or #2 fuel oil to which there has been no reclaimed oil or waste oil or other waste materials added. The sulfur content of the #2 fuel oil fired in Source ID 035 shall not at any time exceed 0.5% (by weight).

II. TESTING REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall, upon Department request, provide fuel analyses or fuel samples of the fuel used in Source ID 035.

#008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.44c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Compliance and performance test methods and procedures for sulfur dioxide.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Compliance and performance test methods and procedures for sulfur dioxide requirements as set forth in 40 CFR §60.44c.

#009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.45c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Compliance and performance test methods and procedures for particulate matter.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Compliance and performance test methods and procedures for particulate matter requirements as set forth in 40 CFR §60.45c.

III. MONITORING REQUIREMENTS.

#010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.46c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Emission monitoring for sulfur dioxide

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Emission monitoring for sulfur oxide requirements as set forth in 40 CFR §60.46c.

#011 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.47c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Emission monitoring for particulate matter.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Emission monitoring for particulate matter requirements as set forth in 40 CFR §60.47c.

IV. RECORDKEEPING REQUIREMENTS.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.95 and 127.511]

The permittee shall keep records of the amount of natural gas and No. 2 fuel oil used each month in Source ID 035. The permittee shall retain these records onsite for at least five (5) years and shall make these records available to the Department upon request.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall keep records of the supporting calculations used to verify compliance with the particulate matter and sulfur oxides emissions limitations for Source ID 035.
- (b) The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source IDs 035 and 036.
- (c) These records shall be retained for at least five (5) years and made available to the Department upon request.

#014 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Reporting and recordkeeping requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Recordkeeping requirements set forth in 40 CFR §60.48c.

V. REPORTING REQUIREMENTS.

#015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on an annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source IDs 035 and 036.
- (b) The annual reports shall be submitted to the Department by no later than March 1 for the preceding January 1-December 31 time period.

#016 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4] Subpart A - General Provisions Address.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 is subject to 40 CFR Part 60 Subpart Dc. The permittee shall comply with all applicable requirements of this subpart as well as any other applicable Subpart of the Standards of Performance, including any recordkeeping and reporting requirements. Pursuant to 40 CFR §60.4 of the Standards of Performance, the submission of all requests, reports, applications, submittals and other communications required by the Standards of Performance must be made to both the Department of Environmental Protection and the Environmental Protection Agency. The Environmental Protection Agency copies may be sent to:

Director Air Protection Division (3APOO) U.S. EPA, Region III 1650 Arch Street Philadelphia, PA 19103-2029

#017 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Reporting and recordkeeping requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable Reporting requirements set forth in 40 CFR §60.48c.

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

01/18/01 PAGE: 40 59-00001

VII. ADDITIONAL REQUIREMENTS.

#018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 035 is a 750 hp, natural gas/#2 fuel oil fired, Johnston model PFTA 750-4LG-200S, boiler (boiler #6).

#019 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.40c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Applicability and delegation of authority.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 035 shall comply with all applicable requirements set forth in 40 CFR §60.40c-§60.48c.

Source ID: 036

Source Name: 750HP JOHNSTON BOILER #2

SOURCE CAPACITY:

31.6 MMBTU/HR Natural Gas 31.6 MMBTU/HR #2 0il

FML FM02 --> |
FML | Comb EP
FM01 -->036 -->S04

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §123.11]

Combustion units

No person may permit the emission from Source ID 036 into the outdoor atmosphere of particulate matter in excess of 0.40 pound per million Btu of heat input.

#002 [25 Pa. Code §123.22]

Combustion units

[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provision in 40 CFR 52.2020(c)]

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from the exhaust of Source ID 036 in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The total combined potential to emit VOCs from Source IDs 035 and 036, shall not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any 12 consecutive month period. Should any of these VOC emissions limitations ever be exceeded, a detailed RACT analysis which meets the criteria specified in 25 Pa. Code Section 129.92 must be submitted to the Department for Source IDs 035 and 036.

#004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.42c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Standard for sulfur dioxide.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Standard for sulfur dioxide requirements as set forth in 40 CFR §60.42c.

#005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.43c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Standard for particulate matter.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

- (a) Source ID 036 shall comply with all applicable Standard for particulate matter requirements set forth in 40 CFR §60.43c.
- (b) The permittee shall not cause to be discharged into the atmosphere from Source ID 036 any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standards under 40 CFR §60.43c apply at all times, except during periods of startup, shut-down, or malfunction.

Fuel Restriction(s).

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 036 is to be fired only on gas (natural or LP) or #2 fuel oil to which there has been no reclaimed oil or waste oil or other waste materials added. The sulfur content of the #2 fuel oil fired in Source ID 036 shall not at any time exceed 0.5% (by weight).

II. TESTING REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall, upon Department request, provide fuel analyses or fuel samples of the fuel used in Source ID 036.

#008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.44c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Compliance and performance test methods and procedures for sulfur dioxide.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Compliance and performance test methods and procedures for sulfur dioxide requirements as set forth in 40 CFR §60.44c.

#009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.45c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Compliance and performance test methods and procedures for particulate matter.
[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Compliance and performance test methods and procedures for particulate matter requirements as set forth in 40 CFR §60.45c.

III. MONITORING REQUIREMENTS.

#010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.46c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Emission monitoring for sulfur dioxide

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Emission monitoring for sulfur oxide requirements as set forth in 40 CFR §60.46c.

#011 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.47c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Emission monitoring for particulate matter.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Emission monitoring for particulate matter requirements as set forth in 40 CFR §60.47c.

IV. RECORDKEEPING REQUIREMENTS.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.95 and 127.511]

The permittee shall maintain keep records of the amount of natural gas and No. 2 fuel oil used each month in Source ID 036. The permittee shall retain these records onsite for at least five (5) years and shall make these records available to the Department upon request.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall keep records of the supporting calculations used to verify compliance with the particulate matter and sulfur oxides emissions limitations for Source ID 036.
- (b) The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source IDs 035 and 036.
- (c) These records shall be retained for at least five (5) years and made available to the Department upon request.

#014 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Reporting and recordkeeping requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Recordkeeping requirements set forth in 40 CFR §60.48c.

V. REPORTING REQUIREMENTS.

#015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on an annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source IDs 035 and 036.
- (b) The annual reports shall be submitted to the Department by no later than March 1 for the preceding January 1-December 31 time period.

#016 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4] Subpart A - General Provisions Address.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 is subject to 40 CFR Part 60 Subpart Dc. The permittee shall comply with all applicable requirements of this subpart as well as any other applicable Subpart of the Standards of Performance, including any recordkeeping and reporting requirements. Pursuant to 40 CFR §60.4 of the Standards of Performance, the submission of all requests, reports, applications, submittals and other communications required by the Standards of Performance must be made to both the Department of Environmental Protection and the Environmental Protection Agency. The Environmental Protection Agency copies may be sent to:

Director Air Protection Division (3APOO) U.S. EPA, Region III 1650 Arch Street Philadelphia, PA 19103-2029

#017 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.48c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Reporting and recordkeeping requirements.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable Reporting requirements set forth in 40 CFR §60.48c.

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

01/18/01 PAGE: 46 59-00001

VII. ADDITIONAL REQUIREMENTS.

#018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 036 is a 750 hp, natural gas/#2 fuel oil fired, Johnston model PFTA 750-4LG-200S, boiler (boiler #5).

#019 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.40c] Subpart Dc - Standards of Performance for Small Industrial- Commercial-Institutional Steam Applicability and delegation of authority.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 122.3]

Source ID 036 shall comply with all applicable requirements set forth in 40 CFR §60.40c-§60.48c.

Source ID: 101

Source Name: LEATHER WATERPROOFING/DYEING OPERATION

SOURCE CAPACITY:

Proc EP 101 -->Z01

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 129.91-129.95]

- (a) All materials (dipping compounds, diluents, etc.) added to each waterproofing/dyeing dip tank of Source ID 101 shall contain (in aggregate) no more than 5.5 pounds of VOCs per gallon. Compliance with this condition shall be determined based on a quarterly average VOC content to be calculated based on all material additions to each tank in a given calendar quarter.
- (b) The VOC content of all dipping compounds used in Source ID 101 shall not be greater than 5.5 pounds per gallon of dipping compound. In determining compliance with this limitation, the term "dipping compound" shall be understood to include only the materials actually used to treat and waterproof or dye the leather and not the diluents, etc. which may be added to the dipping compounds.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 129.91-129.95]

The maximum VOC emissions from Source ID 101 shall never exceed 55 tons in any 12 consecutive month period.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

Under no circumstances shall any dipping compounds, diluents or cleanup solvents containing methylene chloride or formaldyhyde be used in Source ID 101. Additionally, the only dipping compound, diluent or cleanup solvent associated with Source ID 101 to contain 1,1,1-trichloroethane shall be Outsole Oil 93x558.

II. TESTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall conduct tests which demonstrate through Method 24 of 40 CFR Part 60 and 25 Pa. Code Chapter 139 of the volatile organic compound (VOC) content of each material (dipping compounds, waterproofing materials, dyeing materials, diluents) and solvent used in Source ID 101.

OR

The permittee shall maintain documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content of each material (dipping compounds, waterproofing materials, dyeing materials, diluents) and solvent used in Source ID 101.

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12, 129.95 and 127.511]

- (a) The permittee shall keep records for Source ID 101 which, at a minimum, shall include the following with respect to each waterproofing/dyeing dip tank incorporated in Source ID 101 to which diluents (thinners, reducers, etc.) and/or any other VOC-containing material (other than dipping compounds) are added:
- (1) The types and amounts of dipping compounds added to each dip tank of

Source ID 101 and the dates of addition,

- (2) The types and amounts of any diluents (thinners, reducers, etc.) and/or other VOC-containing materials added to each dip tank of Source ID 101 and the dates of addition.
- (b) For each waterproofing/dyeing dip tank incorporated in Source ID 101 to which only a dipping compound is added, the permittee shall keep records of the type and amount of dipping compound added to the dip tank and the dates of addition.
- (c) The permittee shall keep separate records of the amounts and types of all cleanup solvents used in Source ID 101 each month.
- (d) These records shall be retained for a minimum of five (5) years and made available to the Department upon request.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall keep records which at a minimum shall include the following information:
- (1) The supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 101.
- (2) The supporting calculations used to verify compliance with the VOC content limitation for all materials (dipping compounds, diluents, etc.) used in Source ID 101.
- (b) These records shall be retained for at least five (5) years and made available to the Department upon request.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the tests conducted or documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content each material (dipping compounds, waterproofing materials, dyeing materials, diluents) and solvent used in Source ID 101. These records shall be retained for a

minimum of 5 years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on a semi-annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 101.
- (b) The semi-annual reports shall be submitted to the Department by no later than: September 1 for the preceding January 1-June 30 time period and March 1 for the preceding July 1-December 31 time period.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95 and 127.511]

- (a) The permittee shall submit reports on a quarterly basis which at a minimum shall include:
- (1) The types and amounts of dipping compounds added to each dip tank of Source ID 101 and the dates of addition during the quarter.
- (2) The types and amounts of any diluents (thinners, reducers, etc.) and/or other VOC-containing materials added to each dip tank of Source ID 101 and the dates of addition.
- (3) For each waterproofing/dyeing dip tank incorporated in Source ID 101 to which only a dipping compound is added, the records of the type and amounts of dipping compound added to the dip tanks of Source ID 101 during the quarter.
- (4) The types and amounts of all cleanup solvents used in Source ID 101 during the quarter.
- (b) The quarterly reports shall be submitted to the Department by no later than the thirtieth day of month following the respective calendar quarter (report is due April 30, July 30, October 30, January 30).

VI. WORK PRACTICE STANDARDS.

#010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 129.91-129.95]

All dip tanks of Source ID 101 shall be kept closed when not in actual use.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 129.91-129.95]

The permittee shall provide training to all employees involved with Source ID 101. The training shall, at a minimum, address the topics of VOC emission minimization techniques and good housekeeping practices.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 129.91-129.95]

The wetting of cleaning rags associated with Source ID 101 shall be done via the use of closed top cleanup solvent plunger cans. Additionally, no waste cleanup solvents (either in bulk or remaining in used cleanup rags) shall be disposed of via evaporation.

VII. ADDITIONAL REQUIREMENTS.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 101 is a leather waterproofing/dyeing operation that includes the following sources:

- (1) Three 165 gallon custom designed leather dip tanks (tanks 1, 3, 4).
- (2) One 165 gallon custom designed heated leather dip tank (tank 2).
- (3) One 135 gallon custom designed leather dip tank (tank 5).
- (4) One 475 gallon custom designed leather dip tank (tank 6).

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01/18/01 PAGE: 52 59-00001

(5) One leather drying room.

Source ID: 102

Source Name: LEATHER TANNING OPERATION

SOURCE CAPACITY:

Proc EP 102 -->Z02

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The maximum VOC emissions from Source ID 102 shall never exceed 11.4 tons in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 129.95]

The permittee shall keep records which at a minimum, shall include the monthly usage records for all VOC-containing materials associated with Source ID 102. These records shall be retained for a minimum of five (5) years and made available to the Department upon request.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 102. These records shall be retained for at least five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on a semi-annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 102.
- (b) The semi-annual reports shall be submitted to the Department by no later than: September 1 for the preceding January 1-June 30 time period and March 1 for the preceding July 1-December 31 time period.

VI. WORK PRACTICE STANDARDS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The permittee shall provide training to all employees involved in the handling of VOC-containing materials associated with Source ID 102. The training shall, at a minimum, address the topics of VOC emission minimization techniques and good housekeeping practices.

VII. ADDITIONAL REQUIREMENTS.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 102 is a leather tanning operation that includes the following sources:

- (1) Tanning solutions prep room.
- (2) Tanning solutions storage tank.
- (3) Tanning vats.
- *** PERMIT SHIELD IN EFFECT. ***

01/18/01 PAGE: 56 59-00001

Source ID: 201

Source Name: DEGREASING OPERATION

SOURCE CAPACITY:

Proc EP 201 -->Z201

I. RESTRICTIONS.

Emission Limitation(s).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The potential to emit VOCs from Source ID 201 shall not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any 12 consecutive month period. Should any of these VOC emissions limitations ever be exceeded, a detailed RACT analysis which meets the criteria specified in 25 Pa. Code Section 129.92 must be submitted to the Department for Source ID 201.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

[25 Pa. Code §127.441] #002

Operating permit terms and conditions.

Additional authority for this permit condition is also derived from 25 Pa. Code Section 129.95]

The permittee shall keep records which at a minimum shall include the amount of degreasing solvent used and the amount of spent degreasing solvent shipped offsite as liquid hazardous waste per calendar year associated with Source ID 201. The permittee shall retain these records onsite for at least five (5) years and shall make these records available

to the Department upon request.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 201. These records shall be retained for at least five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on an annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 201.
- (b) The annual reports shall be submitted to the Department by no later than March 1 for the preceding January 1-December 31 time period.

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 201 is a degreasing operation that includes three Safety Kleen degreasing sinks. The surface area of each degreasing sink is less than 10 square feet.

PERMIT SHIELD IN EFFECT.

SECTION D. Source Level Requirements

Source ID: 202

Source Name: KEROSENE CLEANING LEATHER SPLITTING BLAD

SOURCE CAPACITY:

Proc EP 202 -->Z202

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The potential to emit VOCs from Source ID 202 shall not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any 12 consecutive month period. Should any of these VOC emissions limitation ever be exceeded, a detailed RACT analysis which meets the criteria specified in 25 Pa. Code Section 129.92 must be submitted to the Department for Source ID 202.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 129.95]

The permittee shall keep records which, at a minimum shall include the amount of kerosene used per calendar year for cleaning of the leather splitting blades of Source ID 202. The permittee shall retain these records onsite for at least five (5) years and shall make these records available to the Department upon request.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 202. These records shall be retained for at least five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on an annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 202.
- (b) The annual reports shall be submitted to the Department by no later than March 1 for the preceding January 1-December 31 time period.

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 202 is the cleaning of leather splitting blades with kerosene.

Source ID: 203

Source Name: SPONGE SOLUTION FUNGICIDE LEATHER TRTMNT

SOURCE CAPACITY:

Proc EP 203 -->Z203

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 129.91-129.95]

The potential to emit VOCs from Source ID 203 shall not exceed 3 pounds per hour, 15 pounds per day or 2.7 tons in any 12 consecutive month period. Should any of these VOC emissions limitations ever be exceeded, a detailed RACT analysis which meets the criteria specified in 25 Pa. Code Section 129.92 must be submitted to the Department for Source ID 203.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 129.95]

The permittee shall keep records which at a minimum shall include the amount of sponge solution fungicide used per calendar year in Source ID 203. The permittee shall retain these records onsite for at least five (5) years and shall make these records available to the Department upon request.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 203. These records shall be retained for at least five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on an annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 203.
- (b) The annual reports shall be submitted to the Department by no later than March 1 for the preceding January 1-December 31 time period.

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 203 is the sponge solution fungicide leather treatment.

Source ID: 205

Source Name: HARNESS&SOLE LEATHER DYEING&TREATING OPR

SOURCE CAPACITY:

Proc EP 205 -->Z205

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The VOC emissions from Source ID 205 shall never exceed 24.4 tons in any 12 consecutive month period.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

All dyes used in Source ID 205 shall have a VOC content of not greater than 5.30 pounds per gallon (prior to the addition of any additives).

II. TESTING REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall conduct tests which demonstrate through Method 24 of 40 CFR Part 60 and 25 Pa. Code Chapter 139 of the volatile organic compound (VOC) content of each dye and solvent used in Source ID 205.

OR

The permittee shall maintain documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content of each dye and solvent used in Source ID

205.

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records which shall at a minimum include the amounts and types of all VOC-containing materials (excluding cleanup solvents) used each month in Source ID 205.

#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.5111

- (a) The permittee shall keep records of the supporting calculations used to verify compliance with the VOC content limitation for dyes used in Source ID 205.
- (b) The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 205.
- (c) These records shall be retained for at least five (5) years and made available to the Department upon request.

[25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the tests conducted or documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content of each dye and solvent used in Source ID 205. These records shall be retained for a minimum of 5 years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The permittee shall periodically submit to the Department a report which describes the permittee's efforts to identify, test and use lower VOC and/or non-VOC containing dyes in Source ID 205. This report shall be submitted to the Department semi-annually (report is due April 30 and October 30).

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on a semi-annual basis that include the supporting calculations used to verify compliance with the annual VOC emissions limitations for Source ID 205.
- (b) The semi-annual reports shall be submitted to the Department by no later than: September 1 for the preceding January 1-June 30 time period and March 1 for the preceding July 1-December 31 time period.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) The permittee shall submit reports on a quarterly basis which at a minimum shall include the amounts and types of all VOC-containing materials (excluding cleanup solvents) used each month in Source ID 205.
- (b) The quarterly reports shall be submitted to the Department by no later than the thirtieth day of month following the respective calendar quarter (report is due April 30, July 30, October 30, January 30).

#010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

Prior to the use of any new dyes or other compounds in Source ID 205, the permittee shall submit data to the Department detailing the chemical

65

makeup and VOC content of the new dye or compound.

VI. WORK PRACTICE STANDARDS.

#011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

Whenever possible, the permittee shall use the combination of dyes that results in the lowest VOC emissions.

#012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The permittee shall continue to identify and test lower VOC and/or non-VOC containing dyes as they become available. Should the use any of these dyes result in a consumer-acceptable leather product, the permittee shall incorporate the use of the respective dye into Source ID 205.

#013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All dyes and other compounds associated with Source ID 205 (including fresh and spent cleanup solvents) shall be stored in closed containers when not in actual use.

#014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The heated leather treatment dip tank of Source ID 205 shall be kept closed when not in actual use. Additionally, the only compounds to be used in this dip tank shall be those compounds identified as being for dip tank use in the application and supplemental materials submitted for plan approval (59-318-002) and any compounds of equivalent volatility and chemical composition (as determined by the Department).

#015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Cleaning rags shall be soaked using plunger cans. Spent solvent (including solvent remaining in used cleaning rags) shall not be disposed of via evaporation.
- (b) Spray guns shall be cleaned by flushing the guns with solvent into containers. For the purposes of compliance, spray gun flushing means passing solvent through the gun while the liquid pressure is at a minimum so as to prevent any atomization of the solvent. All spray gun lines shall be cleaned by flushing into containers.

#016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The spray booths associated with Source ID 205 shall be equipped with a full set of spray booth filters.

VII. ADDITIONAL REQUIREMENTS.

#017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Source ID 205 is a harness and sole leather dyeing and treating operation that includes the following:
- (1) A Neatsfoot Oil (Mardol 822) application area.
- (2) Two leather dye spray booths (one located in harness leather room and one located in the sole leather dipping room).
- (3) A heated leather treatment dip tank and a harness leather drying room.
- (b) The spray booths associated with Source ID 205 shall be equipped with a full set of spray booth filters.
- (c) The spray booth located in the sole leather dipping room is also used for the dyeing of sole leather.

#018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The only VOC-containing cleanup solvent associated with Source ID 205 shall be solvent 6400, as identified in the application and supplemental

materials submitted for plan approval (59-318-002).

#019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

- (a) All VOC-containing dyes used in the spray booths associated with Source ID 205, shall be applied via airless or air-assisted airless spray guns only. Under no circumstances shall any VOC-containing dyes be applied using conventional, air atomizing spray guns.
- (b) The use of conventional, air atomizing spray guns in Source ID 205, shall be limited to the application of dyes that contain no VOCs. The only non-VOC containing dyes identified in the application for plan approval (59-318-002) are WU-4045 and W-509.

#020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The permittee shall never add any thinners or other additives, other than water, to any of the dyes or compounds used in Source ID 205.

Source ID: 206

Source Name: C.E.ROGERS RETAN BOX DRYER

SOURCE CAPACITY:

Proc CD EP 206 -->S206

I. RESTRICTIONS.

Emission Limitation(s).

#001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The particulate matter emissions from Source ID 206 shall never exceed 0.04 grains per dry standard cubic foot.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

The permittee shall keep records of the supporting calculations used to verify compliance with the particulate matter emissions limitations for Source ID 206. These records shall be retained for at least five (5) years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VI. WORK PRACTICE STANDARDS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep on hand a sufficient quantity of spare fabric collector bags for the fabric collector (ID C206) associated with Source ID 206 in order to be able to immediately replace any bags requiring replacement due to deterioration resulting from routine operation of Source ID 206 and its associated fabric collector (ID C206).

VII. ADDITIONAL REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source ID 206 is a C.E. Rogers retan box (spent tanning solutions) box dryer, the air contaminant emissions from which shall be controlled by a integral fabric collector (ID C206). The integral fabric collector is also known as a integral fabric filter.

Source ID: 209

Source Name: FUEL OIL STORAGE TANK

SOURCE CAPACITY:

#2 0il

Proc EP 209 -->Z209

I. RESTRICTIONS.

Throughput Restriction(s).

#001 [25 Pa. Code §129.57]

Storage tanks less than or equal to 40,000 gallons capacity containing VOCs. The permittee shall not store any liquid containing volatile organic compounds (VOC) with a vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions in the storage tank of Source ID 209 unless the tank is equipped with pressure relief valves which are maintained in good operating condition and which are set to release at no less than 0.7 psig of pressure or 0.3 psig of vacuum, or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep a record of the vapor pressure of the contents of the storage tank of Source ID 209 unless the tank is equipped with pressure relief valves. These records shall be retained for a minimum of

71

5 years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#003 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

Source ID 209 is 25,000 gallon, above ground, #2 fuel oil storage tank.

Source ID: 211

Source Name: CONDENSED LIQUID STORAGE TANKS

SOURCE CAPACITY:

Proc EP 211 -->Z211

I. RESTRICTIONS.

Throughput Restriction(s).

#001 [25 Pa. Code §129.57]

Storage tanks less than or equal to 40,000 gallons capacity containing VOCs. The permittee shall not store any liquid containing volatile organic compounds (VOC) with a vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions in the storage tanks of Source ID 211 unless the tank is equipped with pressure relief valves which are maintained in good operating condition and which are set to release at no less than 0.7 psig of pressure or 0.3 psig of vacuum, or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall keep a record of the vapor pressure of the contents of the storage tanks of Source ID 211 unless the tank is equipped with pressure relief valves. These records shall be retained for a minimum of 5 years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

Source ID 211 includes the following above ground, condensed tanning liquids storage tanks:

- (1) One 4,000 gallon storage tank.
- (2) One 5,000 gallon storage tank.
- (3) One 6,000 gallon storage tank.

59400001

Source ID: 213

Source Name: MISCELLANEOUS STORAGE TANKS

SOURCE CAPACITY:

Proc 213 -->Z213

I. RESTRICTIONS.

Throughput Restriction(s).

#001 [25 Pa. Code §129.57]

Storage tanks less than or equal to 40,000 gallons capacity containing VOCs The permittee shall not store any liquid containing volatile organic compounds (VOC) with a vapor pressure greater than 1.5 psia (10.5 kilopascals) under actual storage conditions in the storage tanks of Source ID 213 unless the tank is equipped with pressure relief valves which are maintained in good operating condition and which are set to release at no less than 0.7 psig of pressure or 0.3 psig of vacuum, or the highest possible pressure and vacuum in accordance with state or local fire codes or the National Fire Prevention Association guidelines or other national consensus standards acceptable to the Department.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

#002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.5111

The permittee shall keep a record of the vapor pressure of the contents of the storage tanks of Source ID 213 unless the tank is equipped with pressure relief valves. These records shall be retained for a minimum of 5 years and made available to the Department upon request.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VI. WORK PRACTICE STANDARDS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

VII. ADDITIONAL REQUIREMENTS.

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

Source ID 213 includes the following above ground storage tanks:

- (1) One 5,363 gallon sulfuric acid storage tank.
- (2) One 11,273 gallon sulfuric acid storage tank.
- (3) One 11,273 gallon mineral oil storage tank.

Source ID: 214

Source Name: LEATHER FINISHING OPERATION

SOURCE CAPACITY:

I. RESTRICTIONS.

Emission Limitation(s).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

- (a) The total combined VOC emissions from all sources of Source ID 214 and all associated cleanup operations shall never exceed 15.5 tons in any 12 consecutive month period.
- (b) The total combined glycol ether emissions from all sources of Source ID 214 and all associated cleanup operations shall never exceed 9.5 tons in any 12 consecutive month period.
- (c) The spray booths, rotary sprayer, and roll coater of Source ID 214 shall apply finishing materials with an actual VOC content of not greater than 4.1 pounds per gallon, as mixed for application.
- (d) The curtain coater of Source ID 214shall not be used to apply anything other than mineral oils, CO 17 (as identified in the October 2, 2000 letter from the permittee to the Department), or any other material for which written Department approval has been obtained.

Operating Schedule Restriction(s).

[25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

The rotary sprayer and each of the spray booths of Source ID 214 shall be equipped with full sets of spray booth filters during any time that

spraying operations are being conducted in the rotary sprayer and/or the spray booths of Source ID 214.

Throughput Restriction(s).

#003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

All VOC and/or HAP-containing cleaning solvents used to clean anything associated with the sources of Source ID 214 shall have a vapor pressure of less than 1 mm Hg.

II. TESTING REQUIREMENTS.

#004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.511]

The permittee shall conduct tests which demonstrate through Method 24 of 40 CFR Part 60 and 25 Pa. Code Chapter 139 of the volatile organic compound (VOC) content of each finishing material and solvent used in Source ID 214.

OR

The permittee shall maintain documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content of each finishing material and solvent used in Source ID 214.

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

01/18/01 PACE: 59400001

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#005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1, 127.12 and 127.511]

- (a) The permittee shall keep records of all VOC and/or HAP-containing materials associated with the operation of Source ID 214. The records shall indicate on a monthly basis the volumes of all finishing materials and all cleaning solvents used, and the volumes of cleaning solvents recovered as liquid hazardous waste.
- (b) The permittee shall maintain a master list of all leather finishing material formulations used in Source ID 214. This master list shall provide the identity and volumes of each specific material used in the respective formulations. This master list shall indicate the VOC content and glycol ether content of each formulation as well as the content of any other HAP which may be present.
- (c) The permittee shall keep records of the supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 214.
- (d) The permittee shall keep records of the supporting calculations used to verify compliance with the annual glycol ether emissions limitation for Source ID 214.
- (e) The permittee shall keep records of the vapor pressures of all VOC and/or HAP containing solvents used to clean anything associated with the sources of Source ID 214 to verify compliance with the 'less than 1 mm HG' vapor pressure limitation.
- (f) The permittee shall keep records of the supporting documentation used to verify compliance with VOC content limitation for finishing materials as-mixed for application used in Source ID 214.
- (g) These records shall be retained for a minimum of 5 years and made available to the Department upon request.

#006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Section 127.5111

The permittee shall keep records of the tests conducted or documentation from the supplier/manufacturer (e.g., certified product data sheets) which certifies the volatile organic compound (VOC) content of each

finishing material and solvent used in Source ID 214. These records shall be retained for a minimum of 5 years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

#007 [25 Pa. Code §127.441]
Operating permit terms and conditions.
[Additional authority for this permit condition is also derived from 25 Pa. Code Section 127.511]

- (a) The permittee shall submit reports to the Department on a semi-annual basis that include the following information:
- (1) The supporting calculations used to verify compliance with the annual VOC emissions limitation for Source ID 214.
- (2) The supporting calculations used to verify compliance with the annual glycol ether emissions limitation for Source ID 214.
- (b) The semi-annual reports shall be submitted to the Department by no later than: September 1 for the preceding January 1-June 30 time period and March 1 for the preceding July 1-December 31 time period.

VI. WORK PRACTICE STANDARDS.

#008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code Sections 127.1 and 127.12]

- (a) The only spraying technologies to be utilized in the spray booths and rotary sprayer of Source ID 214 shall be high volume low pressure (HVLP), airless and air-assisted airless.
- (b) All VOC and/or HAP-containing materials utilized in Source ID 214 shall be kept in closed containers when not in actual use.
- (c) All spray guns shall be cleaned by either soaking them in a container of cleaning solvent or spraying cleaning solvent through the guns at reduced pressure into closed containers. Gun lines shall be flushed into closed containers. All used cleaning rags shall be stored in closed containers prior to disposal or reuse.

VII. ADDITIONAL REQUIREMENTS.

#009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Source ID 214 is a leather finishing operation and includes the following sources:
- (1) Four Binks Andrea 10 foot spray booths.
- (2) One 6 foot spray booth.
- (3) One 8 foot spray booth.
- (4) One Hampton Machine automated rotary sprayer and associated 1.25 MMBtu/hr natural gas-fired drying oven.
- (5) One Kela # L78-S WACHSA roll coater.
- (6) One DuBois Machine Company #CC70 curtain coater used for the application of mineral oils, CO 17 (as identified in the October 2, 2000 letter from the permittee to the Department), or any other material for which written Department approval has been obtained.
- (7) Leather splitting, buffing and plating machines that are vented to a fabric collector. The fabric collector's exhaust is vented indoors.

01/18/01 PAGE: 81 59-00001

No Alternative Operations exist for this Title V Facility

SECTION F. Emission Trading Groups

01/18/01 PAGE: 82 59-00001

No Emission Trading Groups exist for this Title V Facility.

	TION G. Ission Restriction S	01/18/0 [/] ummary 5!	1 PAGE: 83 9-00001
DEP	ID Source Description	on Emission Limit	Pollutant
035	750HP JOHNSTON	.400 Lbs/MMBTU 4.000 Lbs/MMBTU	P000 S0X
036	750HP JOHNSTON	.400 Lbs/MMBTU 4.000 Lbs/MMBTU	P000 SOX
101	LEATHER WATERPR	55.000 Tons/Yr	VOC
102	LEATHER TANNING	11.400 Tons/Yr	VOC
201	DEGREASING OPER	3.000 Lbs/Hr 15.000 Lbs/Day 2.700 Tons/Yr	VOC VOC
202	KEROSENE CLEANI	3.000 Lbs/Hr 15.000 Lbs/Day 2.700 Tons/Yr	VOC VOC
203	SPONGE SOLUTION	3.000 Lbs/Hr 15.000 Lbs/Day 2.700 Tons/Yr	VOC VOC
205	HARNESS&SOLE LE	24.400 Tons/Yr	VOC
214	LEATHER FINISHI	9.500 Tons/Yr 15.500 Tons/Yr	T109 VOC

The following air contaminant sources are considered to be of minor significance to the Department and have been determined to be exempt from permit requirements. However, this determination does not exempt the sources from compliance with all applicable air quality regulations specified in 25 Pa. Code Chapters 121-143:

- (1) One "Wetin" Machine.
- (2) One laboratory electric muffle furnace.
- (3) One leather sanding and buffing operation (Wetstock Division) the particulate matter emissions from which shall be controlled by a model SPB 132.12 Dixie Trifab fabric collector (located outside the building), the exhaust from which is returned to the building interior.
- (4) One sole and belt cutting operation (Cutstock Division) the particulate matter emissions from which shall be controlled by a model FJB 108-211 Fabric Max fabric collector (located outside the building), the exhaust from which is returned to the building interior.
- (5) Five 1,600 gallon plastic storage tanks located in the Scrubhouse area.
- (6) Two 300 gallon wooden storage tanks located in Scrubhouse area.
- (7) One spray booth used for waxing of bends which shall comply with the requirements specified in the Request for Determination approved July 7, 2000.
- (8) Water based spray application of leather cut soles with Aqueous Spray Coat product JM-4138 which shall comply with the requirements specified in the Request for Determination approved October 20, 1998.