



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: January 8, 2004

Effective Date: February 1, 2004

Expiration Date: January 31, 2009

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 this permit. 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: 06-05014](#)

Federal Tax Id - Plant Code: 22-1037275-1

Owner Information

Name: GST AUTOLEATHER INC.

Mailing Address: 16 S FRANKLIN ST
FLEETWOOD, PA 19522

Plant Information

Plant: GST AutoLeather / FLEETWOOD PLT

Location: 06 Berks County

06804 Fleetwood Borough

SIC Code: 3111 Manufacturing - Leather Tanning And Finishing

Responsible Official

Name: CHRIS R EHRET

Title: DIR OF REG AFF

Phone: (610) 944 - 7601

Permit Contact Person

Name: CHRIS R EHRET

Title: DIR OF REG AFF

Phone: (240) 313 - 4515

[Signature] _____

LEIF ERICSON, SOUTHCENTRAL REGION AIR PROGRAM MANAGER



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



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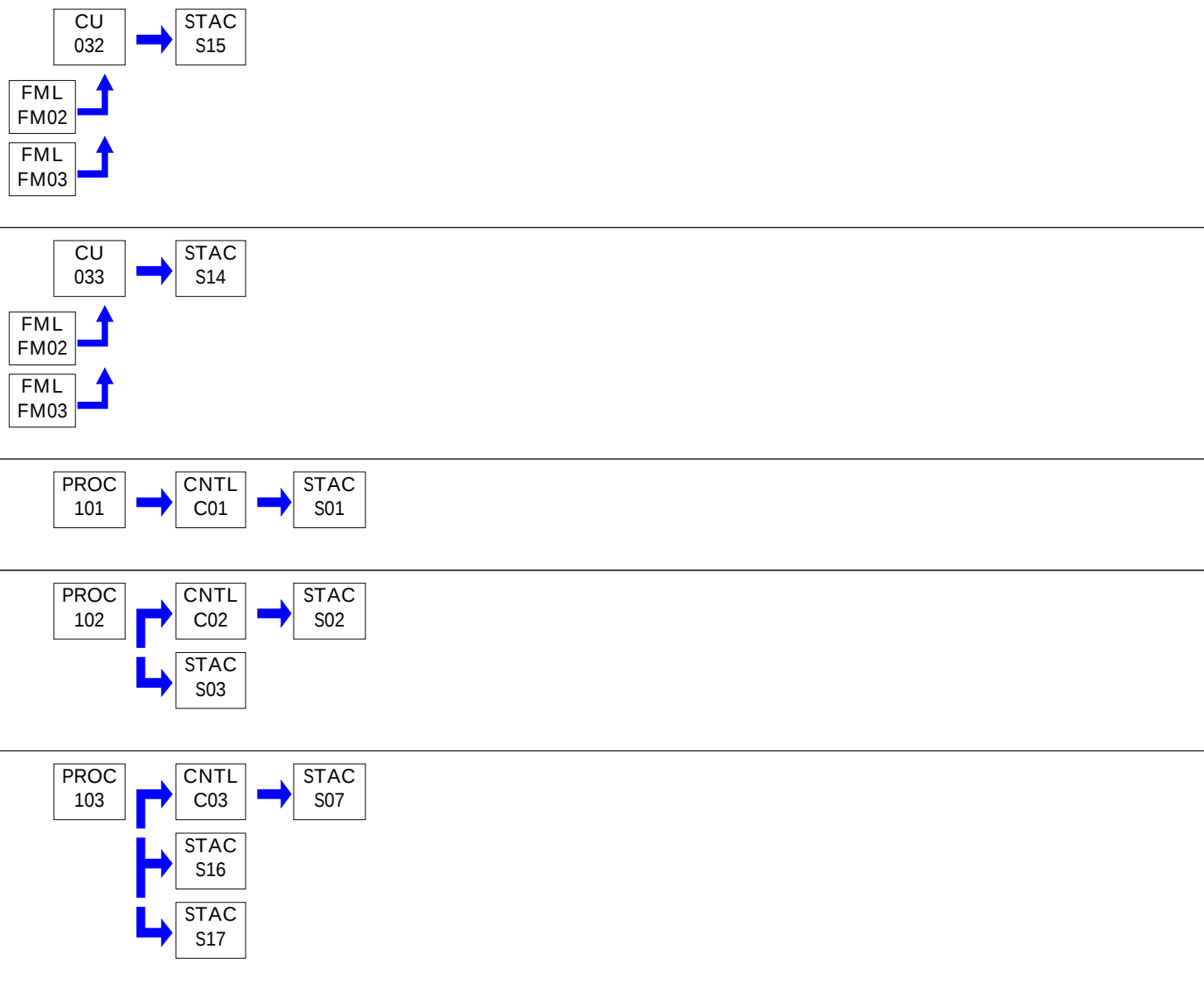
Source ID	Source Name	Capacity/Throughput	Fuel/Material
032	BOILER (ORR & SEMBOWER)	25.20 MMBTU / HR	
		140.00 Gal / HR	#2 Oil
		10.00 MCF / HR	Natural Gas
033	BOILER (SUPERIOR)	25.20 MMBTU / HR	
		176.80 Gal / HR	#2 Oil
		25.20 MCF / HR	Natural Gas
101	LEATHER BUFFING OPERATION	6,000.00 Lbs / HR	LEATHER HIDES
102	WHOLE HIDE SPRAY LINE 1	69.00 Lbs / HR	SOLVENT
103	WHOLE HIDE SPRAY LINE 5	69.00 Lbs / HR	SOLVENT APPLIED
104	WHOLE HIDE SPRAY LINE 3	69.00 Lbs / HR	SOLVENT APPLIED
105	WHOLE HIDE SPRAY LINE 6 (R&D)	3.00 Lbs / HR	SOLVENT APPLIED
108	HAND SPRAY BOOTH LINE 7	35.00 Lbs / HR	SOLVENT APPLIED
116	WHOLE HIDE SPRAY LINE 2	69.00 Lbs / HR	SOLVENT APPLIED
117	WHOLE HIDE SPRAY LINE 4	69.00 Lbs / HR	SOLVENT APPLIED
121	MIXING AND STORAGE AREAS		
122	HAND SPRAY STATION (COLOR ROOM)	5.00 Lbs / HR	SOLVENT APPLIED
123	PARTS CLEANER		
C01	FABRIC COLLECTOR		
C02	WATER WASH & SPRAY TOWER LINE 1		
C03	WATER WASH & SPRAY TOWER LINE 5		
C05	WATER WASH & SPRAY TOWER LINE 3		
C06	WATER WASH & SPRAY TOWER LINE 6		
C08	WATER WASH & SPRAY TOWER LINE 2		
C09	WATER WASH & SPRAY TOWER LINE 4		
C11	FILTERS, DRY, LINE #7		
C12	FILTERS, DRY, COLOR ROOM		
FM02	NO. 2 OIL TANK		
FM03	NATURAL GAS PIPELINE		
S01	STACK: BUFFING OPERATION		
S02	STACK: LINE 1 BOOTH		
S03	STACK: LINE 1 DRYING AREA		
S07	STACK: LINE 5 BOOTH		
S08	STACK: LINE 3 BOOTH		
S09	STACK: LINE 7 BOOTH		
S10	STACK: LINE 2 BOOTH		
S11	STACK: LINE 4 BOOTH		
S14	STACK: SUPERIOR BOILER		
S15	STACK: ORR & SEMBOWER		
S16	STACK: LINE 5 DRYER		
S17	STACK: LINE 5 DRYER		
S18	STACK: LINE 3 DRYER		
S19	STACK: LINE 3 DRYER		
S20	STACK: LINE 2 DRYER		
S21	STACK: LINE 4 DRYER		
S22	STACK: LINE 4 DRYER		
S23	STACK: LINE 6 DRYER		
S27	STACK: LINE 6 BOOTH		
S29	STACK: COLOR ROOM		

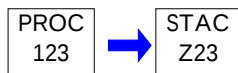
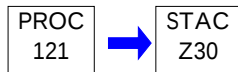
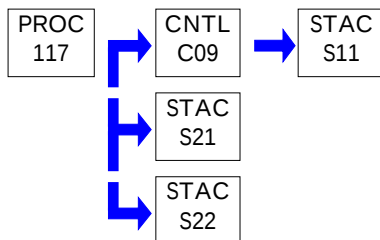
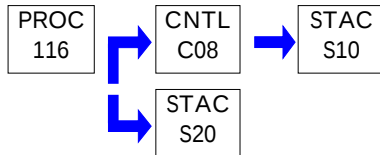
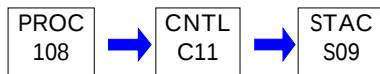
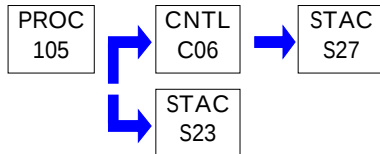
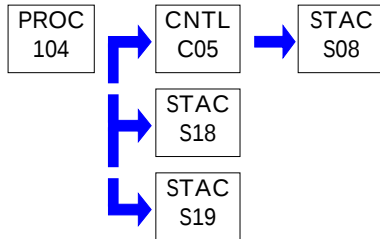


Section A. Site Inventory List

Z23	FUGITIVE: PARTS CLEANING	
Z30	VENTS: MIXING / STORAGE AREA	

PERMIT MAPS





**Section B. General Title V Requirements**

#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 operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 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.

Section B. General Title V Requirements

#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

Section B. General Title V Requirements

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 Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. 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.

#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.

Section B. General Title V Requirements

#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.

Section B. General Title V Requirements

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 NO_x from a single source during the term of the permit and 5 tons of NO_x 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 §

Section B. General Title V Requirements

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 satisfies 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:

Office of Enforcement and Permit Review (3AP10)
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 certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other

Section B. General Title V Requirements

certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

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, 127.463(e) & 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.

Section B. General Title V Requirements

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) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, 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 should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance 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.

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

Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release

Section B. General Title V Requirements

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 submit the RMP to the federal Environmental Protection Agency 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) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) 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 of 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.

Section B. General Title V Requirements

(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.

SECTION C. Site Level Requirements**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

No person shall permit the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

- a. Construction or demolition of buildings or structures.
- b. Grading, paving and maintenance of roads and streets.
- c. 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.
- d. Clearing of land.
- e. Stockpiling of materials.
- f. Open burning operations.
- g. Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 1. the emissions are of minor significance with respect to causing air pollution;
 2. the emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

002 [25 Pa. Code §123.41]

Limitations

No person shall 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:

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

003 [25 Pa. Code §123.42]

Exceptions

The emission limitations of 123.41 shall not apply when:

- a. The presence of uncombined water is the only reason for failure of the emission to meet the limitation;
- b. The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- c. The emission results from sources specified in Site Level Requirements, Condition #001.

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 § 129.91]

SECTION C. Site Level Requirements

The Department reserves the right to require exhaust stack testing of the sources and fuel oil sampling as necessary to verify emissions for purposes of emission fees, malfunctions or permit condition violations.

005 [25 Pa. Code §139.1]

[Sampling facilities.](#)

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

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

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §123.43]

[Measuring techniques](#)

Visible air contaminants may be measured using either of the following:

- a. A device approved by the Department and maintained to provide accurate opacity measurements.
- b. Observers, trained and certified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

007 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall conduct a weekly inspection during regular business workdays around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodorous emissions as follows:

- a) Visible emissions in excess of the limits stated in Section C, Condition #002. Visible emissions may be measured according to the methods specified in Section C, Condition #006. As an alternative, plant personnel who observe such visible emissions shall report each incident to the Department within four hours of the occurrence and arrange for a certified observer to read the visible emissions.
- b) Presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #016.
- c) Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #017.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain a logbook for recording the exceedances of malodorous air contaminants, visible emissions and fugitive visible emissions. The headings of the logbook shall include the name of the company representative, the date and time of the monitoring and the wind direction.

V. REPORTING REQUIREMENTS.

009 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is derived from 25 pa. Code § 129.91]

SECTION C. Site Level Requirements

The permittee shall submit quarterly reports to the Lancaster District Supervisor which include the following:

- a. monthly VOC emissions for each coating line
- b. twelve (12) month running total of VOCs for each coating line
- c. twelve (12) month running total of VOCs for all sources

010 [25 Pa. Code §127.512]

Operating permit terms and conditions.

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

The permittee shall report malfunctions which occur at the Title V facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, 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 unusual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

a. Malfunctions which occur at the Title V facility and which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

b. Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of Condition (014) (a), shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

The permittee shall take all reasonable actions to prevent particulate matter from the sources listed above from becoming airborne. These actions shall include, but not be limited to, the following:

- a. 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.
- b. Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- c. Paving and maintenance of roadways.
- d. 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 [25 Pa. Code 123.1 and 123.2].

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §123.2]

Fugitive particulate matter

No person shall emit particulate matter into the outdoor atmosphere from the sources specified in Condition #001 if the emissions are visible at the point the emissions pass outside the persons property.

013 [25 Pa. Code §123.31]

Limitations

No person shall permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in

SECTION C. Site Level Requirements

such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

014 [25 Pa. Code §129.14]

Open burning operations

No person shall conduct open burning of materials in such a manner that:

- a. The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- b. Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
- c. The emissions interfere with the reasonable enjoyment of life and property.
- d. The emissions cause damage to vegetation or property.
- e. The emissions are or may be deleterious to human or animal health.

This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P. S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.

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 **

SECTION D. Source Level Requirements

Source ID: 032

Source Name: BOILER (ORR & SEMBOWER)

Source Capacity / Throughput:

25.20 MMBTU / HR

140.00 Gal / HR

#2 Oil

10.00 MCF / HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

No person shall permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pound per million BTU of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, in excess of the rate of 4 pounds per million Btu of heat input.

003 [25 Pa. Code §123.22]

Combustion units

The permittee shall not permit the use of commercial fuel oil which contains sulfur in excess of 0.5%, by weight.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The permittee shall limit annual emissions of VOCs to 2.7 TPY for the boiler based on a 12 month running total.

Fuel Restriction(s).

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The permittee shall only operate the boiler on commercial natural gas or No.2 fuel oil.

SECTION D. Source Level Requirements**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.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall sample each shipment of fuel oil before use in the boiler. As an alternative, the permittee shall obtain annually a certification for each oil supplier as to the sulfur content and the heating value in BTUs of the oil as delivered and a delivery receipt with each delivery.

IV. RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The annual certification shall contain the following information: name of supplier, sampling location, samples methods, frequency of sampling and sulfur limit. The delivery receipt shall list the supplier, the type of oil, the sulfur content and the heating value in BTUs.

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 033

Source Name: BOILER (SUPERIOR)

Source Capacity / Throughput:

25.20 MMBTU / HR

176.80 Gal / HR

#2 Oil

25.20 MCF / HR

Natural Gas



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

No person shall permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pounds per million BTU of heat input.

002 [25 Pa. Code §123.22]

Combustion units

No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, in excess of the rate of 4 pounds per million Btu of heat input.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

a. The permittee shall limit annual emissions of VOCs for the boiler to 2.7 TPY based on a 12 month running total.

b. The permittee shall operate the boiler on either commercial natural gas or No.2 fuel oil.

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 Generating Units Standard for sulfur dioxide.

[Additional authority for this permit condition is derived from 25 Pa. Code § 123.22]

The permittee shall not permit the use of commercial fuel oil which contains sulfur in excess of 0.5%, by weight.

005 [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 Generating Units Reporting and recordkeeping requirements.

The boiler is subject to Subpart Dc of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports,

SECTION D. Source Level Requirements

applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director
Air Protection Division
U.S. EPA, Region III
1650 Arch Street
Philadelphia, Pa 19103-2029

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.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 40 CFR, Part 60, Subpart Dc, Standards of Performance for New Stationary Sources]

The permittee shall sample each shipment of fuel oil before use in the boiler. As an alternative, the permittee shall obtain annually a certification for each oil supplier as to the sulfur content and the heating value in BTUs of the oil as delivered and a delivery receipt with each delivery.

007 [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 Generating Units
Standard for sulfur dioxide.**

The permittee may show compliance with the sulfur content limit by a certification from the fuel oil supplier.

IV. RECORDKEEPING REQUIREMENTS.

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for this condition is derived from 40 CFR Part 60, Subpart Dc, Standards of Performance for New Stationary Sources]

The annual certification shall contain the following information: name of supplier, sampling location, samples methods, frequency of sampling and sulfur limit. The delivery receipt shall list the supplier, the type of oil, the sulfur content and the heating value in BTUs.

009 [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 Generating Units
Reporting and recordkeeping requirements.**

The permittee shall record the amounts of fuel oil combusted daily.

010 [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 Generating Units
Reporting and recordkeeping requirements.**

SECTION D. Source Level Requirements

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

The permittee shall maintain records of all fuel analyses or fuel oil certifications for each shipment of No.2 fuel oil received for the most recent five year period. These records shall be available to the Department representatives upon request.

V. REPORTING REQUIREMENTS.

011 [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 Generating Units](#)
[Reporting and recordkeeping requirements.](#)

The permittee shall submit reports of the percent sulfur of the fuel oils fired in the boiler every 6-months. The reports shall include the following:

- a. Calendar dates covered by the report
- b. Each 30-day average sulfur content (percent by weight) of the fuel oil fired calculated during the reporting period including the last 30-day period
- c. Reasons for any noncompliance with the standard and a description of the corrective actions taken
- d. A fuel certification from each fuel oil supplier
- e. A certification from the permittee stating that item d includes all of the suppliers for which fuel oil was fired in the boiler

012 [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 Generating Units](#)
[Reporting and recordkeeping requirements.](#)

The owner or operator shall submit notification to the EPA Administrator of the date of construction, reconstruction, anticipated startup and the actual startup. The notification shall include also the design heat inputs capacities, annual capacity factors and other parameters as stated under Section 60.48(c).

VI. WORK PRACTICE REQUIREMENTS.

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.

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

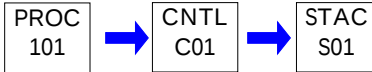
*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 101

Source Name: LEATHER BUFFING OPERATION

Source Capacity / Throughput: 6,000.00 Lbs/HR LEATHER HIDES

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter in a manner that the particulate matter concentration in the effluent gas exceeds 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.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall install and maintain a pressure gauge to measure the pressure drop across the fabric collector.

IV. RECORDKEEPING REQUIREMENTS.

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

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 REQUIREMENTS.

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.

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

***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 102

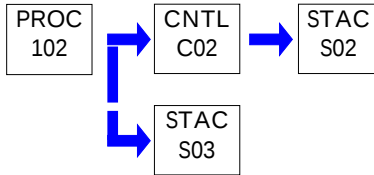
Source Name: WHOLE HIDE SPRAY LINE 1

Source Capacity / Throughput:

69.00 Lbs/HR

SOLVENT

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 103

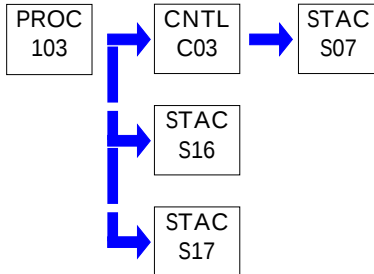
Source Name: WHOLE HIDE SPRAY LINE 5

Source Capacity / Throughput:

69.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 104

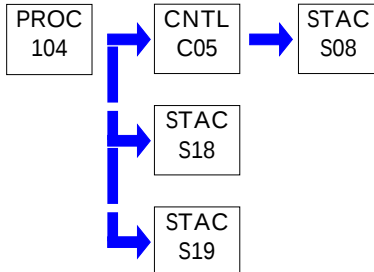
Source Name: WHOLE HIDE SPRAY LINE 3

Source Capacity / Throughput:

69.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 105

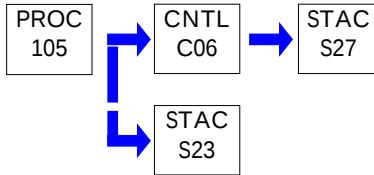
Source Name: WHOLE HIDE SPRAY LINE 6 (R&D)

Source Capacity / Throughput:

3.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 108

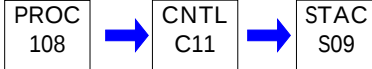
Source Name: HAND SPRAY BOOTH LINE 7

Source Capacity / Throughput:

35.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 116

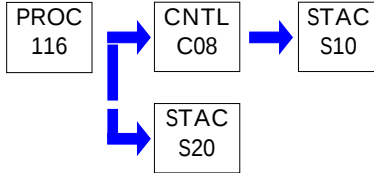
Source Name: WHOLE HIDE SPRAY LINE 2

Source Capacity / Throughput:

69.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 117

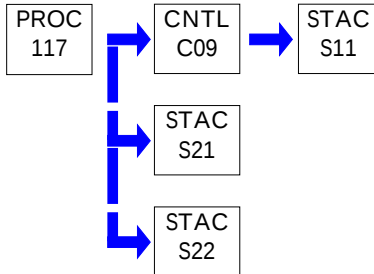
Source Name: WHOLE HIDE SPRAY LINE 4

Source Capacity / Throughput:

69.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

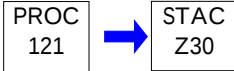
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 121

Source Name: MIXING AND STORAGE AREAS

Source Capacity / Throughput:

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

001 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The Mixing and Storage areas shall be limited to only water based coatings as limited by the coating line limitations.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 122

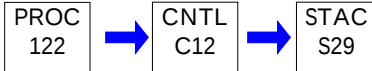
Source Name: HAND SPRAY STATION (COLOR ROOM)

Source Capacity / Throughput:

5.00 Lbs/HR

SOLVENT APPLIED

This source occurs in the following groups: SG01
SG02

**I. RESTRICTIONS.**

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

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.

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

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 REQUIREMENTS.

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.

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

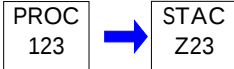
*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 123

Source Name: PARTS CLEANER

Source Capacity / Throughput:

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall not use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

The above requirement does not apply:

- To cold cleaning machines used in extreme cleaning service.
- If the permittee demonstrates, and the Department approves in writing, that compliance with these conditions will result in unsafe operating conditions.
- To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

Throughput Restriction(s).

002 [25 Pa. Code §129.63]

Degreasing operations

Any immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

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.

003 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall maintain for at least two (2) years and shall provide to the Department, on request, the following information:

- The name and address of the solvent supplier.
- The type of solvent including the product or vendor identification number.
- The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

**SECTION D. Source Level Requirements****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 REQUIREMENTS.

004 [25 Pa. Code §129.63]
Degreasing operations

The permittee shall for immersion cold cleaning machines and remote reservoir cold cleaning machines:

Have a permanent, conspicuous label summarizing the operating requirements below:

- a. Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- b. Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- c. Sponge, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
- d. Air agitated solvent baths may not be used.
- e. Spills during solvent transfer and use of the cold cleaning machine shall be cleaned-up immediately.

In addition, the label shall include the following discretionary good operating practices:

- a. Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- b. When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- c. Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

005 [25 Pa. Code §129.63]
Degreasing operations

The immersion cold cleaning machines shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than six (6) inches shall constitute an acceptable cover.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §129.63]
Degreasing operations

The permittee that operates a parts washer or cold cleaning machines that use two gallons or more of solvent containing greater than 5% VOC content by weight for the cleaning of metal parts shall comply with the requirements listed in this section.

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: SG01

Group Description: Leather Coating Lines (7)

Sources included in this group:

ID	Name
102	WHOLE HIDE SPRAY LINE 1
103	WHOLE HIDE SPRAY LINE 5
104	WHOLE HIDE SPRAY LINE 3
105	WHOLE HIDE SPRAY LINE 6 (R&D)
108	HAND SPRAY BOOTH LINE 7
116	WHOLE HIDE SPRAY LINE 2
117	WHOLE HIDE SPRAY LINE 4
122	HAND SPRAY STATION (COLOR ROOM)

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The permittee shall limit the VOC in the coatings (as applied) used on the Whole Hide Spray Lines #3 & #5 to the following RACT limits:

- a. Top coats and base coats- 6.67 pounds of VOC per gallon of coating solids (as applied)
- b. Color coats and others - 4.52 pounds of VOC per gallon of coating solids (as applied)

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

Whole Hide Spray Line #6 (R&D) is restricted to an annual VOC emission limit of 10.0 tons during any consecutive 12-month period.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code Sections 127.1, 127.12b & 129.91]

The permittee shall limit the content of VOC in the coatings (as applied) used on the Whole Hide Spray Lines #2, #4 and #6 to the following BAT limits:

- a. Top coats and base coats- 5.36 pounds of VOC per gallon of coating solids (as applied)
- b. Color coats and others - 4.52 pounds of VOC per gallon of coating solids (as applied)

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

Whole Hide Spray Lines #3, #5, #2, #4 are restricted to the following limits on VOC emissions:

SECTION E. Source Group Restrictions.

- (a) Spray Line #3: 69 #/ hr, 1240 #/ day, or 35.5 tons during any consecutive 12-month period
- (b) Spray Line #5: 69 #/ hr, 1240 #/ day, or 46.6 tons during any consecutive 12-month period
- (c) Spray Line #2: 69 #/ hr, 1240 #/ day, or 70.2 tons during any consecutive 12-month period
- (d) Spray Line #4: 69 #/ hr, 1240 #/ day, or 55.0 tons during any consecutive 12-month period

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with the Plan Approval No. 06-5014A, the permittee shall limit the emissions from the Whole Hide Spray Line #1 to the following during any consecutive 12-month period:

- a. VOC - 29 tons
- b. Total HAPs - 12 tons

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The VOC emissions from the use of dyes on any of the lines shall be limited to 2.7 tons during any consecutive 12-month period.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with the Plan Approval No. 06-5014, the permittee shall operate the Whole Hide Spray Line #1 such that there are no visible or malodorous emissions.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is derived 25 Pa. Code § 129.91]

The Hand Spray Station (Color Room) and the Hand Spray Booth Line #7 are restricted to an annual emission limit of 2.7 tons during any consecutive 12-month period each.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with the Plan Approval No. 06-5014A, the permittee shall limit the content of VOC in the coatings (as applied) used on the Whole Hide Spray Line #1 to the following:

- a. Top and Base Coats - 5.36 pounds of VOC per gallon of coating solids
- b. Color Coats and all others - 4.52 pounds of VOC per gallon of coating solids

010 [25 Pa. Code §123.13]

Processes

No person shall permit the emission into the outdoor atmosphere of particulate matter from any of these sources which exceeds .04 grains per dry standard cubic foot (DSCF).

**SECTION E. Source Group Restrictions.****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.

011 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall monitor all particulate controls for pressure drop across the control devices.

IV. RECORDKEEPING REQUIREMENTS.

012 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records of the following from the coating lines:

- a. Monthly emissions of VOC,
- b. 12-month rolling total VOC,
- c. Monthly hours of operation.

013 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The permittee shall maintain records sufficient to demonstrate compliance with the VOC limits in this permit. At a minimum, the permittee shall maintain daily records for the coating lines including the following:

- a. The following parameters for each coating, thinner and component as applied:
 - 1. The coating, thinner or component name and identification number,
 - 2. The volume used,
 - 3. The mix ratio.
 - 4. The density or specific gravity,
 - 5. The weight percent of total volatiles, water, solids and exempt solvent,
 - 6. The volume percent of solids.
- b. The VOC content of each coating, thinner and other component as supplied.
- c. The VOC content of each coating as applied.

014 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The Permittee shall record the quantity and identity of all VOC solvents used for clean-up purposes on all sources on a daily basis. These records shall be maintained and shall be made part of the permittee's annual "AIMS" report to the Department.

015 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The VOC emissions from the use of dyes shall be reported with the emissions for the source(s) on which the dyes are applied and included in that source's VOC total limit.

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.**

016 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

Any new coating or any compositional change in an existing coating shall be reported to the Lancaster District Supervisor within thirty (30) days of its use. Information to be reported shall include items (a) through (h) of condition #017, below.

017 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

Annual reports containing, but not limited to, the following data for each coating shall be submitted to the Lancaster District Supervisor:

- a. Coating Identification
- b. Coating use (e.g., extreme performance coatings)
- c. Pounds of VOC per gallon of solids applied
- d. Coating density (at 25°C)
- e. Percent VOC (weight)(total volatiles-minus water and EPA exempted solvents)
- f. Percent total volatiles (weight)
- g. Percent solids (weight)
- h. Percent water (weight)
- i. Percent (weight)(EPA exempted solvents)
- j. Gallons per year of coating used
- k. Percent solids (volume)
- l. Pounds per year of VOC emissions

VI. WORK PRACTICE REQUIREMENTS.

018 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

[Additional authority for this permit condition is derived from 25 Pa. Code § 129.91]

The permittee shall operate all Whole Hide Spray Lines with:

- a. Coordinated air assisted airless spray guns.
- b. Photoelectric eyes (or equivalent) to minimize over spray by coordinating the spray guns.

019 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

In accordance with the Plan Approval No. 06-5014A, equipment (a rotameter or equivalent, as approved by the Department), shall be provided so that at the request of the Department the water flow rate to the control device can be measured.

020 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

In accordance with the Plan Approval No. 06-5014A: equipment (a Differential manometer or equivalent, as approved by the Department), shall be provided and maintained so that at any time the pressure drop across the control device on the whole hide spray line #1 can be measured.

021 [25 Pa. Code §127.441]

[Operating permit terms and conditions.](#)

The water flow rate to the water washes shall be maintained, at least, at the following rates:

SECTION E. Source Group Restrictions.

- a. Line #3: 1000 gallons per minute
- b. Line #5: 500 gallons per minute
- c. Line #2: 1000 gallons per minute
- d. Line #4: 1000 gallons per minute
- e. Line #6: 500 gallons per minute
- f. Line # 1: 500 gallons per minute

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall arrange that during an inspection the Department can visually inspect the water flow rate to the water washes.

VII. ADDITIONAL REQUIREMENTS.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC content of each as applied coating, expressed in units of weight of VOC per volume of coating solids, as follows for the coating lines:

$$\text{VOC} = (\text{Wo})(\text{Dc}) / \text{Vn}$$

Where:

VOC = VOC content in pounds per gallon of coating solids,

Wo = Weight percent of VOC (Wv - Ww - Wex)

Wv = Weight percent of total volatiles (100% - weight percent solids),

Ww = Weight percent of water,

Wex = Weight percent of exempt solvents,

Dc = Density of coating (pounds per gallon, at 25°C), and

Vn = Volume percent of solids of the as applied coating.

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: SG02

Group Description: MACT for Leather Coating

Sources included in this group:

ID	Name
102	WHOLE HIDE SPRAY LINE 1
103	WHOLE HIDE SPRAY LINE 5
104	WHOLE HIDE SPRAY LINE 3
105	WHOLE HIDE SPRAY LINE 6 (R&D)
108	HAND SPRAY BOOTH LINE 7
116	WHOLE HIDE SPRAY LINE 2
117	WHOLE HIDE SPRAY LINE 4
122	HAND SPRAY STATION (COLOR ROOM)

I. RESTRICTIONS.**Emission Restriction(s).**

001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5305]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations**What emission standards must I meet?**

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and Plan Approval No. 06-5014A]

The permittee shall limit the HAP emissions from the coating lines to the following during any consecutive 12-month period:

HAP per type of leather product process operation:

a. Leather Upholstery with coatings of 4 grams per square foot or more -

2.6 pounds per 1,000 square feet of leather coated

b. Leather Upholstery with coatings of less than 4 grams per square foot -

6.8 pounds per 1,000 square feet of leather coated

002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5320]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations**How does my affected major source comply with the HAP emission standards?**

[Additional authority for this condition is derived from 25 Pa Code Section 127.441, Plan Approval No. 06-5014A and 40 CFR Part 63, Section 63.5330 & 63.5360]

The permittee shall maintain the compliance ratio for the affected facility at or below 1.00.

II. TESTING REQUIREMENTS.

003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5345]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations**How do I distinguish between the two upholstery product process operations?**

The permittee shall determine the type of leather finishing being conducted by measuring the amount of add-on finish applied to the leather. This shall be determined as follows:

a. Initial Mass: Weigh a representative section of polyester film, paper, cardstock or equivalent material substrate to be finished of a known area to determine the initial mass.

SECTION E. Source Group Restrictions.

b. Upon completion of the measurements, the representative section of substrate shall be processed on the finishing line as the typical section of leather.

c. Final Mass: After the finishing and drying process, the representative section of substrate shall be weighed to determine the final mass.

d. Determine the Finish Add-on value using the following equation:

$$\text{Finish Add-on} = (\text{Final Mass} - \text{Initial Mass}) / (\text{Surface Area})$$

A scale with an accuracy of at least 5 percent of the mass in grams of the representative section of the substrate being used in the testing.

004 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5385]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I measure the quantity of finish applied to the leather?](#)

[Additional authority for this condition is derived from 25 Pa Code 127.441 and Plan Approval No. 06-5014A]

The permittee shall determine the amount of finish applied to the leather by measuring the mass, or density, and the volume of each applied finish.

a. The mass of each applied finish shall be determined with a scale calibrated to an accuracy of at least 5 percent of the amount measured. The quantity of all finishes used for finishing operations must be weighed or have a predetermined weight.

b. The density and volume of each applied finish shall be determined as follows:

1. The density in pounds per gallon of each applied finish shall be determined using the reference method - EPA Method 24 of Appendix A of 40 CFR Part 60. An alternative method may be used if approved by the Administrator and/or the Department.

2. The volume measurements of each applied finish can be obtained with a flow measurement device. The device shall meet the requirements of 40 CFR Section 63.5385(c)(2)(i) through (v).

3. The volume measurements of each applied finish can be obtained with calibrated volumetric containers with an accuracy of at least 5 percent of the measured volume.

005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5390]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I measure the HAP content of a finish?](#)

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and Plan Approval No. 06-5014A]

The HAP content of a finish shall be determined by using the reference method - EPA Method 311 of Appendix A of 40 CFR Part 63. An alternative method may be used if approved by the Administrator and/or the Department.

The permittee may use a weighted average of HAP content analysis for each finish when the finishes are:

a. Mixed by the permittee on site

b. New quantities of finish are mixed with previous quantities of finish that may have a different HAP content.

006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5395]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I measure the density of a finish?](#)

The permittee shall use the weighted average of finish densities as determined in Condition # 004 for each finish when one of the following actions is performed:

SECTION E. Source Group Restrictions.

- a. Finishes are mixed on site
- b. Finishes of different densities are mixed.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5400]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How do I measure the quantity of leather processed?

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

To determine the surface area of the leather processed at the facility for each product process operation, the permittee shall measure the surface area of each piece of processed or shipped leather. The measurement shall be done by a computer scanning system accurate to 0.1 square foot. The system shall be initially calibrated for minimum accuracy to the manufacturer's specifications. For similar leather production runs, use an average based on a minimum of 500 pieces of leather in lieu of individual measurements. The permittee may submit an alternative measuring method for approval by the Department.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5400]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How do I measure the quantity of leather processed?

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The permittee shall measure the surface area of processed leather substrate exiting the Whole Hide Spray Line No. 1. Beginning 12 months before February 13, 2005, the permittee shall measure the surface area of all processed leather upon exiting the finishing operation for the entire facility.

By the fifteenth of each month, the permittee shall determine the quantity of leather processed in 1,000s of square feet for each product process operation during the previous month. After collecting data on the amount of leather processed for 12 months, the permittee shall determine the annual total leather processed by the Whole Hide Spray Line No. 1, until February 1, 2005, at which time the permittee must determine the facility annual total of leather processed. These values shall be in 1,000s of square feet. The annual values shall be determined by the fifteenth of each month for the previous 12-month period. These annual totals shall be used in determining the compliance ratio.

The permittee shall only count each piece of leather once in determining the quantity of leather processed, regardless of the number of times the piece of leather is reprocessed through the line. A piece of leather, that has been completely stripped of all applied finishes and is reprocessed through the line, may be counted a second time.

III. MONITORING REQUIREMENTS.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5355]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How do I monitor and collect data to demonstrate continuous compliance?

The permittee shall collect data at all required interval as specified in the compliance plan.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5360]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How do I demonstrate continuous compliance with the emission standards?

The permittee shall collect and monitor data according to the procedures in the compliance plan to demonstrate compliance.

IV. RECORDKEEPING REQUIREMENTS.

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5320]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How does my affected major source comply with the HAP emission standards?

SECTION E. Source Group Restrictions.

[Additional authority for this condition is derived from 25 Pa Code Section 127.441, Plan Approval No. 06-5014A and 40 CFR Part 63, Section 63.5430]

The permittee shall keep an inventory log to record monthly the surface area of leather processed in 1,000s of square feet for each product process operation. You may be required to start record keeping prior to the compliance dates specified in this permit. The log shall include the following:

- a. Dates for each leather product process operation
- b. Total surface area of leather processed for each leather product process operation

012 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5320]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)
[How does my affected major source comply with the HAP emission standards?](#)

[Additional authority for this condition is derived from 25 Pa Code Section 127.441, Plan Approval No. 06-5014A and 40 CFR Part 63, Sections 63.5335 & 63.5430]

The permittee shall maintain a finish inventory log for each coating line including the following on a monthly basis:

- a. Finish type
- b. Pounds (or density and volume) of each finish applied to the leather
- c. Mass fraction of HAP in each applied finish
- d. Date of the recorded entry
- e. Time of the recorded entry
- f. Name of the person recording the entry
- g. Product process operation type

This report shall be completed by the 15th day of the following month.

013 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5330]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)
[How do I determine the compliance ratio?](#)

[Additional authority for this condition is derived from 40 CFR Section 63.5360]

Prior to February 13, 2005, the permittee shall determine the compliance ratios for the facility including the Whole Hide Spray Line No. 1 for the last 12 months for each type of leather product process operation for the facility. The ratios shall be determined by the fifteenth of the following month for this 12 month period. The 12-month compliance ratios shall be determined by the fifteenth of every successive month, thereafter. The ratios shall be determined using the following equation:

HAP compliance ratio = (12-month actual HAP emissions) / (12-month allowable HAP emissions)

014 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5330]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)
[How do I determine the compliance ratio?](#)

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

Once the Whole Hide Spray Line #1 has operated for 12 months, the permittee shall determine the compliance ratios for the line by the fifteenth of next month for the 12 month period for each type of leather product process operation for the coating line. The 12 month compliance ratios shall be determine by the fifteenth of every successive month, thereafter. The compliance ratios shall be determined using the following equation:

HAP compliance ratios = (12-month actual HAP emissions) / (12-month allowable HAP emissions)

This condition becomes void when the permittee is required to determine a facility compliance ratios.

SECTION E. Source Group Restrictions.

015 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5335]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I determine the actual HAP loss?](#)

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

Once the Whole Hide Spray Line No. 1 has operated for 12 months, the permittee shall determine the actual monthly HAP emissions for the line by the fifteenth of the next month for each type of leather product process operation for the coating line. The monthly actual HAP emissions shall be determined by the fifteenth of every successive month, thereafter. The actual monthly HAP emissions shall be determined using the information contained in the finish inventory log and the following equation:

Actual HAP emissions = (monthly total of pounds of finish applied in each type of leather product process operation) x (mass fraction of HAP in each finish applied in each type of leather product process operation)

The past 12 month emissions shall be totaled to determine the 12-month total HAP emissions for the line.

This condition becomes void when the permittee is required to determine the facility actual HAP emissions.

016 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5335]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I determine the actual HAP loss?](#)

[Additional authority for this condition is derived from 40 CFR Section 63.5360]

Prior to February 13, 2005, the permittee shall determine the actual monthly HAP emissions for the facility including the Whole Hide Spray Line No. 1 for the last 12 months for each type of leather product process operation for the facility. The actual monthly HAP emissions shall be determined by the fifteenth of the following month for this 12-month period. The monthly HAP emissions shall be determined by the fifteenth of every successive month, thereafter. The HAP emissions shall be determined using the following equation:

Actual monthly HAP emissions = (monthly total of pounds of finish applied in each type of leather product process operation) x (mass fraction of HAP in each finish applied in each type of leather product process operation)

The past 12 month emissions shall be totaled to determine the 12-month actual HAP emissions for the facility.

017 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5340]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I determine the allowable HAP loss?](#)

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and Plan Approval No. 06-5014A]

Once the Whole Hide Spray Line No. 1 has operated for 12 months, the permittee shall determine the allowable 12-month HAP emissions for the line by the fifteenth of the next month for the 12 month period for each type of leather product process operation for the coating line. The allowable emissions shall be determined by the fifteenth of every successive month, thereafter. The allowable HAP emissions shall be determined using the following equation:

Allowable HAP emissions = (12-month rolling total of leather coated) x (HAP allowable as per Condition #001)

This condition becomes void when the permittee is required to determine a facility allowable HAP emissions.

018 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5340]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How do I determine the allowable HAP loss?](#)

[Additional authority for this condition is derived from 40 CFR Section 63.5360]

SECTION E. Source Group Restrictions.

Prior to February 13, 2005, the permittee shall determine the allowable 12-month HAP emissions for the facility including the Whole Hide Spray Line No. 1 for the last 12 months for each type of leather product process operation for the coating line. The facility 12-month allowable HAP emissions shall be determined by the fifteenth of the following month for this 12 month period. The 12 month allowable HAP emissions shall be determined by the fifteenth of every successive month, thereafter. The allowable HAP emissions shall be determined using the following equation:

Allowable HAP emissions = (12-month rolling total of leather coated) x (HAP allowable as per condition #001)

019 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5425]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
When must I start recordkeeping to determine my compliance ratio?

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The permittee shall begin all record keeping for the Whole Hide Spray Line No. 1 upon start-up.

020 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5425]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
When must I start recordkeeping to determine my compliance ratio?

The permittee shall begin record keeping for determining the facility compliance ratio no later than February 13, 2004.

021 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5430]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What records must I keep?

The permittee shall keep a copy of each notification and report that are required to be submitted in accordance with this subpart.

022 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5430]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What records must I keep?

The permittee shall keep a record of any performance tests conducted in accordance with this subpart.

023 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5430]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What records must I keep?

The permittee shall maintain all necessary records to document the methods used and the results of all HAP content measurements of each applied finish.

024 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5435]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
In what form and how long must I keep my records?

The permittee shall keep all records in a form suitable and readily available for expeditious review. Each record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record shall be kept onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. You can keep the records offsite for the remaining 3 years.

025 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5450]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What parts of the General Provisions apply to me?

**SECTION E. Source Group Restrictions.**

[Additional authority for this condition is derived from 25 Pa Code 127.441, Plan Approval No. 06-5014A and 40 CFR Sections 63.1 and 63.5430]

The permittee shall maintain a copy of the initial applicability determination for the leather finishing facility.

V. REPORTING REQUIREMENTS.

026 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5360]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How do I demonstrate continuous compliance with the emission standards?

[Additional authority for this condition is derived from 40 CFR Section 63.5420, 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The permittee shall report each instance in which the facility does not meet the emission standards. This includes periods of start-up, shutdown and malfunction. The deviations shall be reported according to the following requirements in a Deviation Report:

- a. The name and address of the owner or operator
- b. The physical address of the leather finishing operation
- c. Each type of leather product process operation performed during the 12-month period covered by the report
- d. The compliance ratio comprising the deviation

The permittee may reduce the frequency of submittal of the Deviation Notification Report, if the Department gives approval.

027 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5415]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What notifications must I submit and when?

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The "Notification of Compliance Status" report shall include the following:

- a. The name and the address of the owner or operator
- b. The physical address of the leather finishing operation
- c. Each type of leather product process operation performed during the previous 12 months
- d. Each HAP identified by the permittee in finishes applied during the 12-month period used for the initial compliance determination
- e. A compliance status certification indicating whether the line or facility complied with all of the requirements of 40 CFR Part 63, Subpart TTTT, National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations throughout the 12-month period for the initial compliance determination. This certification must include the following items:
 1. A statement that the compliance plan is complete and available on site for inspection
 2. A statement that the procedures described in the compliance plan are being followed
 3. A statement that the compliance ratio value is less than or equal to 1.00, or the ratio value was determined to be greater than 1.00

028 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5415]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What notifications must I submit and when?

The permittee shall submit a "Notification of Compliance Status" report no later than 60 days (April 2, 2005) after determining the initial 12-month compliance ratio for the facility.

029 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5415]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What notifications must I submit and when?

**SECTION E. Source Group Restrictions.**

[Additional authority for this condition is derived from 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The permittee shall submit a "Notification of Compliance Status" report for the Whole Hide Spray Line No. 1 no later than 60 days (December 30, 2003) after determining the initial 12-month compliance ratio.

030 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5420]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What reports must I submit and when?

The permittee shall submit annual compliance status certifications 12 months (April 2, 2006) after the submission of the "Notification of Compliance Status" report. Each subsequent annual compliance certification is due 12 months after the previous annual compliance status certification. The annual compliance status certification provides the compliance status for each month during the 12-month period ending 60 days prior to the date on which the report is due (February 1 through January 31).

031 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5420]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What reports must I submit and when?

The annual compliance status certification shall include the following items:

- a. The name and address of the owner or operator
- b. The physical address of the leather finishing operation
- c. Each type of leather product process operation
- d. Each HAP identified by the permittee in finishes applied during the 12-month period covered by the report
- e. A compliance status certification indicating whether the facility complied with all of the requirements of 40 CFR Part 63, Subpart TTTT, National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations throughout the 12-month period for the initial compliance determination. This certification must include the following items:
 1. A statement that the procedures described in the compliance plan are being followed
 2. A statement that the compliance ratio value is less than or equal to 1.00, or the ratio value was determined to be greater than 1.00

032 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5450]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
What parts of the General Provisions apply to me?

[Additional authority for this condition is derived from 40 CFR Sections 63.10 & 63.13, 25 Pa Code Section 127.441 and the Plan Approval No. 06-5014A]

The leather finishing facility is subject to 40 CFR Part 63, Subpart TTTT of the National Emission Standards for Hazardous Air Pollutants for source categories and shall comply with all applicable requirements of this subpart. 40 CFR Section 63.10 requires the submission of all requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to :

Director
Air, Toxics and Radiation Division
U. S. EPA, Region III
1650 Arch Street
Philadelphia, Pa 19103

VI. WORK PRACTICE REQUIREMENTS.

033 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5320]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations
How does my affected major source comply with the HAP emission standards?

SECTION E. Source Group Restrictions.

[Additional authority for this condition is derived from 25 Pa Code Section 127.441, Plan Approval No. 06-5014A and 40 CFR Part 63, Sections 63.5330, 63.5335 and 63.5340]

The permittee shall within 15 days of the end of each month determine the following for the facility for each type of leather product process operation:

- The actual HAP emissions in the previous month
- The allowable HAP emissions for the previous 12-month period
- The actual HAP emissions for the previous 12-month period
- The compliance ratio for the previous 12-month period
- The surface area of leather processed the previous month
- The surface area of leather processed the previous 12-month period

034 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5320]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[How does my affected major source comply with the HAP emission standards?](#)

The permittee shall operate the coating lines in compliance with the requirements at all times, including periods of start-up, shutdown and malfunction.

035 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5325]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[What is a plan for demonstrating compliance and when must I have one in place?](#)

[Additional authority for this condition is derived from 40 CFR Sections 63.5320 & 63.5430]

The permittee shall develop and implement a written plan for demonstrating compliance that provides detailed procedures that will be followed to monitor and record data necessary for demonstrating compliance with 40 CFR Part 63, Subpart TTTT. Procedures followed for quantifying HAP loss from the facility and amount of leather processed vary from the facility because of site-specific factors such as equipment design characteristics and operating conditions. Typical procedures include one or more accurate measurement methods such as weigh scales and volumetric displacement. The permittee shall develop and implement a site-specific plan for demonstrating compliance not later than the compliance date in this permit. The plan is incorporated into this permit by reference. The plan shall include the following items:

- The name and address of the owner or operator
- The physical address of the leather finishing facility
- Provide a detailed description of all methods of measurement the facility will use to determine the finish usage, HAP content of each finish, quantity of leather processed, and the leather product process operation type
- Specify when each measurement will be made
- Provide examples of each calculation you will use to determine compliance status. Include examples of how the measured data in one parameter will be converted to other terms for use in determining compliance.
- Provide example logs of how data will be recorded
- Provide a quality assurance/quality control plan to ensure that data continue to meet compliance demonstration needs

The plan shall be kept onsite and readily available as long as the leather finishing facility is in operation. The current plan and any previous versions of the plan shall be kept and made readily available for inspection for at least five years after each revision.

This plan need only be developed for final compliance - February 13, 2005.

036 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5450]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[What parts of the General Provisions apply to me?](#)

[Additional authority for this condition is derived from 40 CFR Section 63.6]

SECTION E. Source Group Restrictions.

At all times, including start-up, shutdown and malfunction, the permittee shall operate and maintain any affected source, including air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

- a. Malfunctions shall be corrected as soon as practicable after their occurrence.
- b. Operation and maintenance requirements established pursuant to Section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards

VII. ADDITIONAL REQUIREMENTS.

037 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5290]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[What parts of my facility does this subpart cover?](#)

All of the sources identified in this source group are subject to the MACT requirements of Subpart TTTT.

038 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5295]

[Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations](#)

[When do I have to comply with this subpart?](#)

The requirements of the source group apply to the Whole Hide Spray Line 1 immediately. All restrictions, work practices, record keeping and reporting required of the facility apply to this line until February 13, 2005. After this date all coating lines are subject to 40 CFR Part 63, Subpart TTTT.

*** Permit Shield in Effect. ***



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

#001

This permit compiles the conditions and operating requirements of RACT OP #06-1014 and PA 06-5014A.

#002

There are no reported trivial activities at this site.

*Note on Fuel Material Location: There is a fuel material location (FML) listed on the Title V application, however, right now, there is no actual physical location or physical tank. This is simply a backup measure for #2 fuel oil. Should using #2 fuel oil become a necessity, a portable tank would probably be brought and kept on site until the need disappears.

*Note on sources 102, 103, 104, 116 and 117: These sources consist of both a spray booth and dryer. Each spray booth is equipped with a water curtain to control particulates. Each booth has an exhaust stack. The drying ovens are not equipped with controls. Dryers 103, 104 and 117 have two exhaust stacks, while dryer 102 and 116 has one exhaust stack. All emissions are reported as if exhausted from the spray booth stacks.



***** End of Report *****