



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: September 30, 2008

Effective Date: October 1, 2008

Expiration Date: September 30, 2013

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: 05-05004

Federal Tax Id - Plant Code: 22-2845011-1

Owner Information

Name: SETON CO
Mailing Address: 135 HORTON DR
SAXTON, PA 16678-1501

Plant Information

Plant: SETON / SAXTON PLT
Location: 05 Bedford County 05928 Saxton Borough
SIC Code: 3111 Manufacturing - Leather Tanning And Finishing

Responsible Official

Name: MARK TAYLOR
Title: PLT MGR
Phone: (814) 635 - 2937

Permit Contact Person

Name: MARK TAYLOR
Title: PLT MGR
Phone: (814) 635 - 2937

[Signature] _____
WILLIAM R WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

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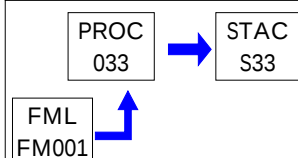
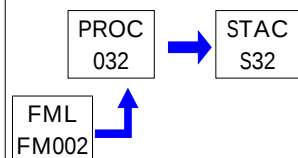
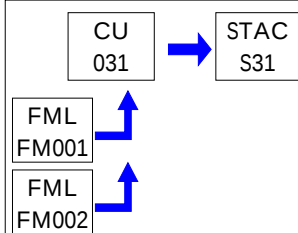
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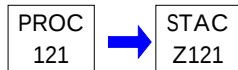
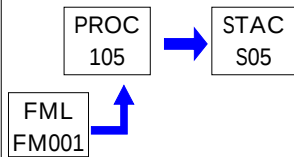
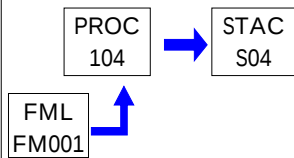
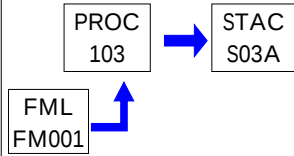
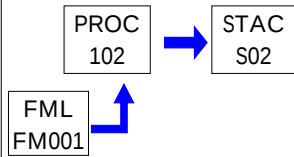
SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	CLEAVER BROOKS	21.000 MMBTU / HR	
		150.000 Gal / HR	#2 Oil
032	(14) OIL FURNACES & (1) HOT WATER HEATER		
033	MIXING ROOM FURNACE	33.000 Gal / HR	Propane
102	SPRAY LINE 2 / DRYER	2.750 Lbs / HR	VOC
		13.300 Gal / HR	Propane
103	SPRAY LINE 3 / DRYER	6.940 Lbs / HR	VOC
		13.300 Gal / HR	LPG
104	SPRAY LINE 4 / DRYER	4.400 Lbs / HR	VOC
		13.300 Gal / HR	LPG
105	SPRAY LINE 5 / DRYER	7.600 Lbs / HR	VOC
		11.000 Gal / HR	LPG
121	ROLLER COATING LINE 21	1.980 Lbs / HR	VOC
FM001	LIQUID PETROLEUM TANKS		
FM002	#2 FUEL OIL TANK		
S02	SPRAYLINE 2 STACK		
S03A	SPRAYLINE 3 STACK		
S04	SPRAYLINE 4 STACK		
S05	SPRAYLINE 5 STACK		
S31	BOILER STACK		
S32	HEATER STACKS		
S33	MIXING ROOM FURNACE STACK		
Z121	ROLL COATER 21 FUGITIVE EMISSIONS		

PERMIT MAPS



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,

SECTION B. General Title V Requirements

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

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

Inspection and Entry

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

(1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

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

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

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

SECTION B. General Title V Requirements

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

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

Duty to Provide Information

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

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

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The 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.

SECTION B. General Title V Requirements

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

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

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

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

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

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

#015 [25 Pa. Code § 127.512(b)]

Severability Clause

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

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

Fee Payment

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

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(e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.

(f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

#017 [25 Pa. Code §§ 127.14(b) & 127.449]

Authorization for De Minimis Emission Increases

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of 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, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less

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than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

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

Reactivation of Sources

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

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

SECTION B. General Title V Requirements

#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:

Air Enforcement Branch (3AP12)
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 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:

SECTION B. General Title V Requirements

(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. 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

SECTION B. General Title V Requirements

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 or, of the submittal date specified elsewhere in the permit, 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 shall 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 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,

SECTION B. General Title V Requirements

(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.

(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.

SECTION B. General Title V Requirements

(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

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

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

002 [25 Pa. Code §123.2]

Fugitive particulate matter

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

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

004 [25 Pa. Code §123.41]

Limitations

No person 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:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one hour.
- (2) Equal to or greater than 60% at any time.

005 [25 Pa. Code §123.42]

Exceptions

The emission limitations of site level condition #004 shall not apply when:

- (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

SECTION C. Site Level Requirements

(3) The emission results from sources specified in site level condition #001.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following conditions are derived from RACT operating permit No. 05-2004]

Volatile Organic Compound (VOC) emissions from the facility must be less than 150 tons based on a 12 month rolling total.

007 [25 Pa. Code §129.14]

Open burning operations

(a) No person shall permit the open burning of material in such a manner that:

(1) 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.

(2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.

(3) The emissions interfere with the reasonable enjoyment of life or property.

(4) The emissions cause damage to vegetation or property.

(5) The emissions are or may be deleterious to human or animal health.

(b) Exceptions: The requirements of subsections (a) above does not apply where the open burning operations result from:

(1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.

(2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(3) A fire set for the prevention and control of disease or pests, when approved by the Department.

(4) A fire set solely for recreational or ceremonial purposes.

(5) A fire set solely for cooking food.

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

II. TESTING REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

III. MONITORING REQUIREMENTS.

009 [25 Pa. Code §123.43]

Measuring techniques

SECTION C. Site Level Requirements

Visible emissions may be monitored daily by using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye as per EPA Method 9, or with the aid of any devices approved by the Department.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct a weekly inspection around the plant periphery during 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 Site Level, condition #004. Visible emissions may be measured according to the methods specified in Site Level condition #009, or alternately, plant personnel who observe such emissions may report the incident of visible emissions to the Department within two (2) hours of each incident, and make arrangements for a certified observer to verify the visible emissions.
- (b) The presence of fugitive emissions visible beyond the plant boundaries as stated in Site Level condition # 002.
- (c) The presence of malodorous air emissions beyond the plant boundaries as stated in Site Level condition #003.

IV. RECORDKEEPING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain a logbook for recording the status of malodors, visible emissions, and fugitive visible emission exceedances. The logbook shall include the name of the company representative, the date and time the monitoring was conducted, and wind direction.

V. REPORTING REQUIREMENTS.

012 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for the following conditions are derived from RACT operating permit No. 05-2004]

- (a) The permittee shall report the following information on solvent-based clean-up solvents:
 - (1) solvent identification
 - (2) solvent density
 - (3) percent water (volume)
 - (4) gallons per month of solvent used during each calendar year
 - (5) pounds per year of VOC emissions
- (b) Should credits be desired for those clean-up solvents sent off-site for either recycling or incineration at a legally permitted facility, the permittee shall provide the following information:
 - (1) the quantities being disposed of
 - (2) the VOC content of the clean-up solvents being disposed of

SECTION C. Site Level Requirements

(3) documentation to verify the above

013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall generate a monthly report which includes as a minimum the following:

- (1) current month emissions
- (2) year-to-date emissions
- (3) 12-month rolling total emissions

The above information shall be used to demonstrate compliance with the facility wide emission limitation in site level condition # 006.

014 [25 Pa. Code §127.512]

Operating permit terms and conditions.

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 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 (2) 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 paragraph (a) above, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

015 [25 Pa. Code §135.21]

Emission statements

The permittee shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

VI. WORK PRACTICE REQUIREMENTS.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep all solvent-based containers which contain VOC materials tightly closed when not in use. Spills of solvent-based materials containing VOCs shall be cleaned up immediately with cleaning cloths or other methods that will minimize the evaporation of VOCs into the atmosphere.

017 [25 Pa. Code §127.444]

Compliance requirements.

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturers' recommendations/specifications, as well as in a manner consistent with good operating practices.

SECTION C. Site Level Requirements

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for the following condition is derived from RACT operating permit No. 05-2004]

The permittee shall maintain Manufacturer's supplied VOC data sheets and /or Material Safety Data Sheets for all surface coatings applied and clean-up solvents used at this Title V facility within the most recent five years, shall be maintained and made available to the Department representative upon request.

VIII. COMPLIANCE CERTIFICATION.

The permittee shall submit within thirty days of 01/31/2009 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit, and annually thereafter.

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***

SECTION D. Source Level Requirements

Source ID: 031

Source Name: CLEAVER BROOKS

Source Capacity / Throughput:

21.000 MMBTU / HR

150.000 Gal / HR

#2 Oil



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

No person shall permit the emission of particulate matter into the outdoor atmosphere from the above boiler in excess of 0.4 pound per million Btu of heat input.

002 [25 Pa. Code §123.22]

Combustion units

(a) No person shall permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from the above boiler in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

(b) The use of fuel oil in the boiler shall not exceed a sulfur content of 0.5 percent by weight.

[Compliance with the requirement(s) specified in this streamlined permit condition assures compliance with the SIP-approved sulfur dioxide emission limit specified in 40 CFR 52.2020(c)(1)]

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee, on a quarterly basis, shall monitor the sulfur content in the No.2 commercial fuel oil delivered to the facility by one of the following:

- (a) laboratory fuel oil analysis, or
- (b) fuel supplier's certification

SECTION D. Source Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

In demonstrating compliance with condition #002 above, the permittee shall maintain records of fuel oil analysis, or fuel certifications for all fuel oil deliveries for the most recent five year period.

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall submit records of all fuel oil analysis performed, or fuel supplier's certifications to the Department representative upon request.

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 032

Source Name: (14) OIL FURNACES & (1) HOT WATER HEATER

Source Capacity / Throughput:

Conditions for this source occur in the following groups: GROUP 002

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

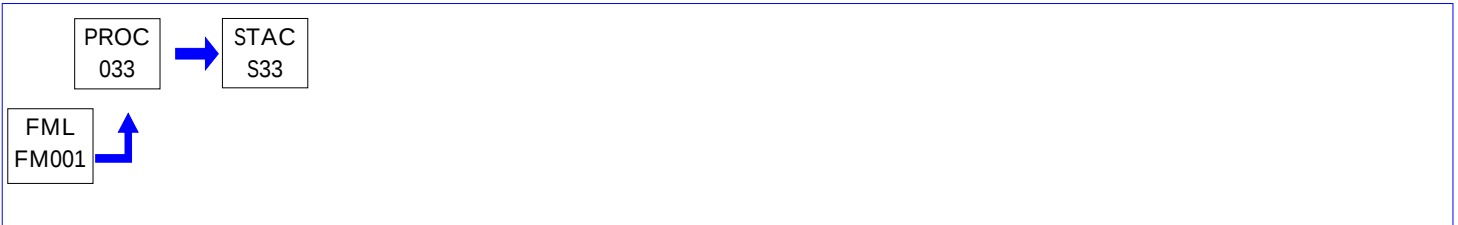
**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: MIXING ROOM FURNACE

Source Capacity / Throughput: 33.000 Gal / HR Propane

Conditions for this source occur in the following groups: GROUP 002

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 102

Source Name: SPRAY LINE 2/DRYER

Source Capacity/Throughput:

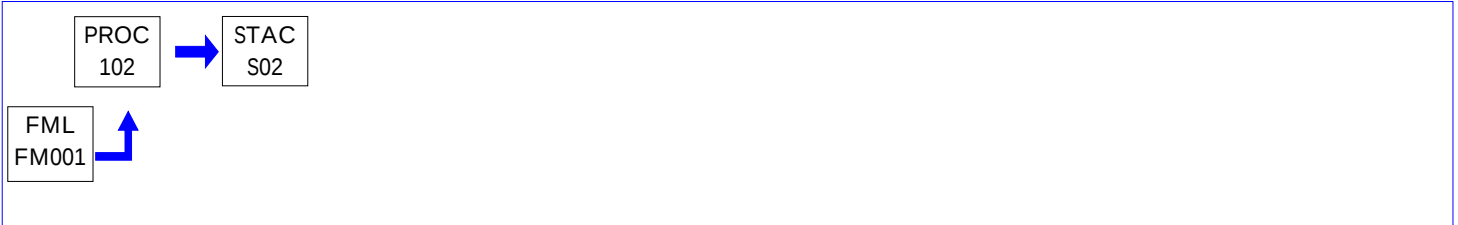
2.750 Lbs/HR

VOC

13.300 Gal/HR

Propane

Conditions for this source occur in the following groups: GROUP 001



I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

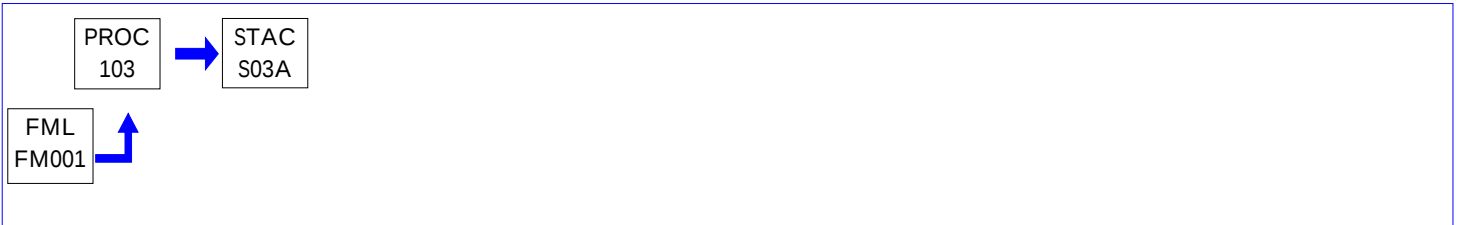
**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: SPRAY LINE 3/DRYER

Source Capacity/Throughput:	6.940 Lbs/HR	VOC
	13.300 Gal/HR	LPG

Conditions for this source occur in the following groups: GROUP 001



This source occurs in alternate operation:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

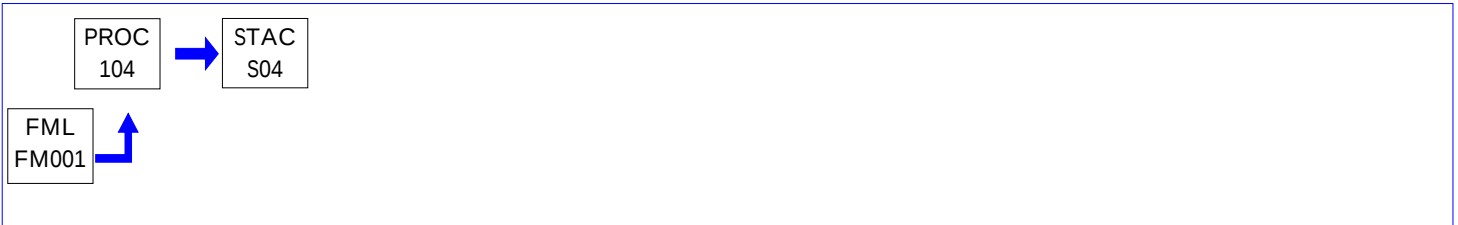
**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: SPRAY LINE 4/DRYER

Source Capacity/Throughput:	4.400 Lbs/HR	VOC
	13.300 Gal/HR	LPG

Conditions for this source occur in the following groups: GROUP 001



This source occurs in alternate operation:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

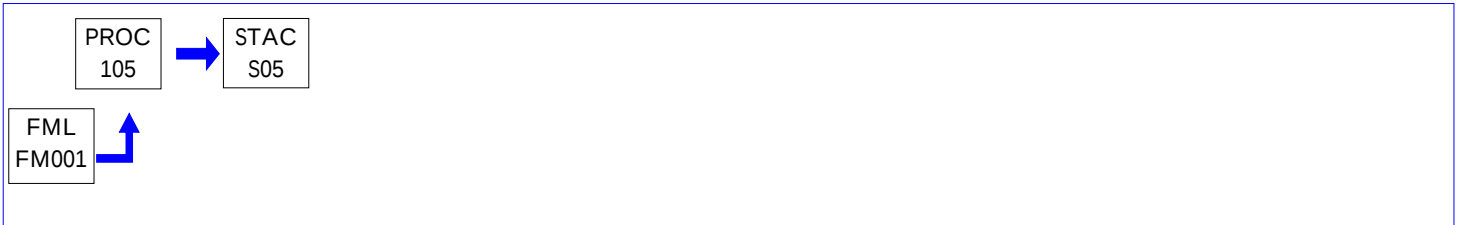
SECTION D. Source Level Requirements

Source ID: 105

Source Name: SPRAY LINE 5/DRYER

Source Capacity/Throughput:	7.600 Lbs/HR	VOC
	11.000 Gal/HR	LPG

Conditions for this source occur in the following groups: GROUP 001



This source occurs in alternate operation:

I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

**SECTION D. Source Level Requirements**

Source ID: 121

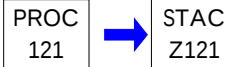
Source Name: ROLLER COATING LINE 21

Source Capacity/Throughput:

1.980 Lbs/HR

VOC

Conditions for this source occur in the following groups: GROUP 001

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: GROUP 001

Group Description: Coating Operations

Sources included in this group:

ID	Name
102	SPRAY LINE 2/ DRYER
103	SPRAY LINE 3/ DRYER
104	SPRAY LINE 4/ DRYER
105	SPRAY LINE 5/ DRYER
121	ROLLER COATING LINE 21

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from any of the above coating lines, at any time, in such a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person shall permit the emission into the outdoor atmosphere of sulfur oxides from any of the coating lines in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

003 [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?**

The emission standards limit the number of pounds of HAP lost per square foot of leather processed. You must meet each emission limit in Table 1 of this subpart that applies to you.

From Table 1:

(1) Upholstery Leather (greater than or equal to 4 grams finish add-on/square feet) for existing sources is 2.6 pounds of HAP loss per 1,000 square feet of leather processed.

II. TESTING REQUIREMENTS.

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?**

(a) To determine the amount of finish applied to the leather, you must measure the mass, or density, and volume of each applied finish.

(b) Determine the mass of each applied finish 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.

(c) Determine the density and volume of each applied finish according to the criteria listed in paragraphs (c)(1) through (3) of this section:

(1) Determine the density of each applied finish in pounds per gallon in accordance with §63.5395. The finish density will be used to convert applied finish volumes from gallons into mass units of pounds.

(2) Volume measurements of each applied finish can be obtained with a flow measurement device. For each flow

SECTION E. Source Group Restrictions.

measurement device, you must perform the items listed in paragraphs (c)(2)(i) through (v) of this section:

- (i) Locate the flow sensor and other necessary equipment such as straightening vanes in or as close to a position that provides a representative flow.
- (ii) Use a flow sensor with a minimum tolerance of 2 percent of the flow rate.
- (iii) Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.
- (iv) Conduct a flow sensor calibration check at least semiannually.
- (v) At least monthly, inspect all components for integrity, all electrical connections for continuity, and all mechanical connections for leakage.

(3) Volume measurements of each applied finish can be obtained with a calibrated volumetric container with an accuracy of at least 5 percent of the amount measured.

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?

(a) To determine the HAP content of a finish, the reference method is EPA Method 311 of appendix A of 40 CFR part 63. You may use EPA Method 311, an alternative method approved by the Administrator, or any other reasonable means for determining the HAP content. Other reasonable means of determining HAP content include, but are not limited to, a material safety data sheet (MSDS) or a manufacturer's hazardous air pollutant data sheet. If the HAP content is provided on a MSDS or a manufacturer's data sheet as a range of values, then the highest HAP value of the range must be used for the determination of compliance to this standard. This value must be entered on the finish log for each type of finish applied. You are not required to test the materials that you use, but the Administrator may require a test using EPA Method 311 (or another approved method) to confirm the reported HAP content. However, if the results of an analysis by EPA Method 311 are different from the HAP content determined by another means, the EPA Method 311 results will govern compliance determinations.

(b) You may use the weighted average of the HAP content analysis as determined in paragraph (a) of this section for each finish when you perform one of the actions listed in paragraphs (b)(1) and (2) of this section:

- (1) Mix your own finishes on site.
- (2) Mix new quantities of finish 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?

(a) To determine the density of a finish, the reference method is EPA Method 24 of appendix A of 40 CFR part 60. You may use EPA Method 24, an alternative method approved by the Administrator, or any other reasonable means for determining the density of a finish. Other reasonable means of determining density include, but are not limited to, an MSDS or a manufacturer's hazardous air pollutant data sheet. If the density is provided on a MSDS or a manufacturer's data sheet as a range of values, then the highest density value of the range must be used for the determination of compliance to this standard. This value must be entered on the finish log for each type of finish applied. You are not required to test the materials that you use, but the Administrator may require a test using EPA Method 24 (or another approved method) to confirm the reported density. However, if the results of an analysis by EPA Method 24 are different from the density determined by another means, the EPA Method 24 results will govern compliance determinations.

(b) You may use the weighted average of finish densities as determined in paragraph (a) of this section for each finish when you perform one of the actions listed in paragraphs (b)(1) and (2) of this section:

- (1) Mix your own finishes on site.
- (2) Mix new quantities of finish with previous quantities of finish that may have different densities.

(c) Equation 1 of this section may be used to determine the weighted average of finish densities, as follows:

Equation 1 reads: Average Weighted Density = $(\text{SUM}(i=1 \text{ to } n) \text{ Mass}(i) \times \text{Density}(i)) / (\text{SUM}(i=1 \text{ to } n) \text{ Mass}(i))$

SECTION E. Source Group Restrictions.

Where:

Average Weighted Density = The average weighted density of applied finishes in pounds per gallon.

Mass = Pounds of finish "i" applied.

Density = The density of finish "i" in pounds per gallon.

n = Number of finish types applied.

NOTE: A more accurate representation of Equation 1 can be found on page 9167 of the Federal Register dated February 27, 2002.

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?](#)

(a) This section describes the information and procedures you must use to determine the quantity of leather processed at your affected source.

(1) To determine the surface area (i.e., quantity) of leather substrate processed each month at your source for each product process operation, follow the procedures in your plan for demonstrating compliance. You must consistently measure the surface area of processed leather substrate at one of the manufacturing locations listed in paragraph (a)(1)(i) or (ii) of this section:

(i) Measure the surface area of processed leather upon exiting the leather finishing operation.

(ii) Measure the surface area of processed leather upon shipment from the source.

(2) By the fifteenth of each month, you must determine the quantity of leather processed in 1,000's of square feet for each product process operation during the previous month. After collecting data on the amount of leather processed for 12 months, you must also determine by the fifteenth of each month the annual total of leather processed in 1,000's of square feet for each product process operation by summing the monthly quantities of leather processed in each product process operation for the previous 12 months. The "annual total of leather processed" in each product process operation is used in Equation 1 of §63.5340 to calculate your allowable HAP loss as described in §63.5340. Your allowable HAP loss is then subsequently used to calculate your compliance ratio as described in §63.5330.

(b) To determine the surface area of leather processed at your source for each product process operation, you must use one of the methods listed in paragraphs (b)(1) and (2) of this section:

(1) Premeasured leather substrate sections being supplied by another manufacturer as an input to your finishing process.

(2) Measure the surface area of each piece of processed or shipped leather with a computer scanning system accurate to 0.1 square feet. The computer scanning system must 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.

(c) Except as provided in paragraph (d) of this section, you must include the surface area of each piece of processed leather only once when determining the monthly quantity of leather processed, regardless of the number of times a piece of leather is reprocessed through a portion of the finishing operations.

(d) If a piece of leather is completely stripped of all applied finishes and reprocessed through the entire finishing operation as if it were a new piece of leather, you may recount the surface area of leather reprocessed when determining the monthly quantity of leather processed.

III. MONITORING REQUIREMENTS.

008 [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?](#)

SECTION E. Source Group Restrictions.

- (a) You must monitor and collect data according to this section.
- (b) You must collect data at all required intervals as specified in your plan for demonstrating compliance as specified at §63.5325.
- (c) Not applicable.
- (d) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the compliance ratio, and, if an emission control device is used, in assessing the operation of the control device.

009 [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?

- (a) You must demonstrate continuous compliance with the emission standards in §63.5305 by following the requirements in paragraphs (a)(1) and (2) of this section:
- (1) You must collect and monitor data according to the procedures in your plan for demonstrating compliance as specified in §63.5325.
 - (2) Not applicable.
 - (3) You must maintain your compliance ratio less than or equal to 1.00, as specified at §63.5330.
- (b) You must report each instance in which you did not meet the emission standards in §63.5305. This includes periods of startup, shutdown, and malfunction. These deviations must be reported according to the requirements in §63.5420(b).
- (c) You must conduct the initial compliance demonstration before the compliance date that is specified for your source in §63.5295.

IV. RECORDKEEPING REQUIREMENTS.

010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall keep records of all coating information as per condition #013.

011 [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?

- (a) If you have a new or reconstructed affected source, you must start recordkeeping to determine your compliance ratio according to one of the schedules listed in paragraphs (a)(1) and (2) of this section:
- (1) If the startup of your new or reconstructed affected source is before February 27, 2002, then you must start recordkeeping to determine your compliance ratio no later than February 27, 2002.
 - (2) If the startup of your new or reconstructed affected source is after February 27, 2002, then you must start recordkeeping to determine your compliance ratio upon startup of your affected source.
- (b) If you have an existing affected source, you must start recordkeeping to determine your compliance ratio no later than February 27, 2004.
- (c) If you have a source that becomes a major source of HAP emissions after February 27, 2002, then you must start recordkeeping to determine your compliance ratio immediately upon submitting your Initial Notification, as required at §63.5415(g).

SECTION E. Source Group Restrictions.

012 [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?

You must satisfy the recordkeeping requirements in paragraphs (a) through (g) of this section by the compliance date specified in §63.5295.

(a) You must keep the plan for demonstrating compliance as required at §63.5325 onsite and readily available as long as the source is operational. If you make any changes to the plan for demonstrating compliance, then you must keep all previous versions of the plan and make them readily available for inspection for at least 5 years after each revision.

(b) You must keep a copy of each notification and report that you are required to submit in accordance with this subpart.

(c) You must keep records of performance tests in accordance with this subpart.

(d) You must record and maintain a continuous log of finish usage as specified at §63.5335(b).

(e) You must maintain all necessary records to document the methods you used and the results of all HAP content measurements of each applied finish.

(f) For each leather product process operation, you must maintain a monthly log of the items listed in paragraphs (f)(1) and (2) of this section:

- (1) Dates for each leather product process operation.
- (2) Total surface area of leather processed for each leather product process operation.

(g) Not applicable.

V. REPORTING REQUIREMENTS.

013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

[Additional authority for the following conditions are derived from RACT operating permit No. 05-2004]

(1) Annual reports containing, but not limited to, the following data shall be submitted to the Altoona District Supervisor:

- (a) coating identification
- (b) coating use (e.g., extreme performance coating)
- (c) pounds of VOC per gallon coating (minus water)
- (d) coating density
- (e) solvent density
- (f) percent solvents (volume) - (minus EPA exempted solvents)
- (g) percent solids (volume)
- (h) percent water (volume)
- (i) gallons per month of coating used (including water) during each calendar year
- (j) gallons per month of coating used (minus water) during each calendar year

SECTION E. Source Group Restrictions.

(k) pounds per year of VOC emissions

(l) total days and hours of operation for the year

014 [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?

(a) In accordance with §§63.7(b) and (c) and 63.9(b) and (h) of the General Provisions, you must submit the one-time notifications listed in paragraphs (b) through (g) of this section.

(b) As specified in §63.9(b)(2), if you start up your affected source before February 27, 2002, you must submit an Initial Notification not later than June 27, 2002.

(c) In the Initial Notification, include the items in paragraphs (c)(1) through (4) of this section:

- (1) The name and address of the owner or operator.
- (2) The physical address of the leather finishing operation.
- (3) Identification of the relevant standard, such as the Leather Finishing Operations NESHAP, and compliance date.
- (4) A brief description of the source including the types of leather product process operations and nominal operating capacity.

(d) As specified in §63.9(b)(1) and (2), if you startup your new or reconstructed affected source on or after February 27, 2002, you must submit an Initial Notification not later than 120 calendar days after you become subject to this subpart.

(e) If you are required to conduct a performance test, you must submit a Notification of Intent to Conduct a Performance Test at least 60 calendar days before the performance test is scheduled to begin as required in §63.7(b)(1).

(f) You must submit a Notification of Compliance Status report not later than 60 calendar days after determining your initial 12-month compliance ratio. The notification of compliance status must contain the items in paragraphs (f)(1) through (5) of this section:

- (1) The name and address of the owner or operator.
- (2) The physical address of the leather finishing operation.
- (3) Each type of leather product process operation performed during the previous 12 months.
- (4) Each HAP identified under §63.5390 in finishes applied during the 12-month period used for the initial compliance determination.
- (5) A compliance status certification indicating whether the source complied with all of the requirements of this subpart throughout the 12-month period used for the initial source compliance determination. This certification must include the items in paragraphs (f)(5)(i) through (iii) of this section:
 - (i) The plan for demonstrating compliance, as described in §63.5325, is complete and available on site for inspection.
 - (ii) You are following the procedures described in the plan for demonstrating compliance.
 - (iii) The compliance ratio value was determined to be less than or equal to 1.00, or the value was determined to be greater than 1.00.

(g) If your source becomes a major source on or after February 27, 2002, you must submit an initial notification not later than 120 days after you become subject to this subpart.

015 [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?

(a) You must submit the first annual compliance status certification 12 months after you submit the Notification of Compliance Status. Each subsequent annual compliance status certification is due 12 months after the previous annual compliance status certification. The annual compliance status certification provides the compliance status for each month

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during the 12-month period ending 60 days prior to the date on which the report is due. Include the information in paragraphs (a)(1) through (5) of this section in the annual certification:

- (1) The name and address of the owner or operator.
 - (2) The physical address of the leather finishing operation.
 - (3) Each type of leather product process operation performed during the 12-month period covered by the report.
 - (4) Each HAP identified under §63.5390, in finishes applied during the 12-month period covered by the report.
 - (5) A compliance status certification indicating whether the source complied with all of the requirements of this subpart throughout the 12-month period covered by the report. This certification must include the items in paragraphs (a)(5)(i) and (ii) of this section:
 - (i) Whether you are following the procedures described in the plan for demonstrating compliance.
 - (ii) The compliance ratio value was determined to be less than or equal to 1.00, or the value was determined to be greater than 1.00.
- (b) You must submit a Deviation Notification Report for each compliance determination you make in which the compliance ratio exceeds 1.00, as determined under §63.5330. Submit the deviation report by the fifteenth of the following month in which you determined the deviation from the compliance ratio. The Deviation Notification Report must include the items in paragraphs (b)(1) through (4) of this section:
- (1) The name and address of the owner or operator.
 - (2) The physical address of the leather finishing operation.
 - (3) Each type of leather product process operation performed during the 12-month period covered by the report.
 - (4) The compliance ratio comprising the deviation. You may reduce the frequency of submittal of the Deviation Notification Report if the responsible agency of these NESHAP does not object.

VI. WORK PRACTICE REQUIREMENTS.

016 [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?**

(a) You must develop and implement a written plan for demonstrating compliance that provides the detailed procedures you will follow to monitor and record data necessary for demonstrating compliance with this subpart. Procedures followed for quantifying HAP loss from the source and amount of leather processed vary from source to source 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. Because the industry does not have a uniform set of procedures, you must develop and implement your own site-specific plan for demonstrating compliance not later than the compliance date for your source. You must also incorporate the plan for demonstrating compliance by reference in the source's title V permit. The plan for demonstrating compliance must include the items listed in paragraphs (a)(1) through (7) of this section:

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

(b) You may be required to revise your plan for demonstrating compliance. We may require reasonable revisions if the procedures lack detail, are inconsistent, or do not accurately determine finish usage, HAP content of each finish, quantity of

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leather processed, or leather product process operation type.

017 [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?

(a) When your source has processed leather for 12 months, you must determine the compliance ratio for your affected source by the fifteenth of each month for the previous 12 months.

(b) You must determine the compliance ratio using Equation 1 of this section as follows:

Equation 1 reads: Compliance Ratio = Actual HAP Loss / Allowable HAP Loss

Where:

Actual HAP Loss = Pounds of actual HAP loss for the previous 12 months, as determined in §63.5335.

Allowable HAP Loss = Pounds of allowable HAP loss for the previous 12 months, as determined in §63.5340.

(1) If the value of the compliance ratio is less than or equal to 1.00, your affected source was in compliance with the applicable HAP emission limits of this subpart for the previous month.

(2) If the value of the compliance ratio is greater than 1.00, your affected source was deviating from compliance with the applicable HAP emission limits of this subpart for the previous month.

018 [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?

(a) This section describes the information and procedures you must use to determine the actual HAP loss from your leather finishing operation. By the fifteenth of each month, you must determine the actual HAP loss in pounds from your leather finishing operation for the previous month.

(b) Use one of the procedures listed in either (b)(1) or (b)(2) of this section for determining the actual HAP loss from your affected sources. Regardless of which procedure is used to determine HAP loss, each source is still required to maintain a written or printed log that documents the total quantity of solvents/finishes used each month in the process and the mass fraction of HAP in each solvent/finish.

(1) Measure Finish as Applied. Use a finish inventory log to record the pounds of each type of finish applied for each leather product process operation and the mass fraction of HAP in each applied finish. Figure 1 of this subpart shows an example log for recording the minimum information necessary to determine your finish usage and HAP loss. The finish inventory log must contain, at a minimum, the information for each type of finish applied listed in paragraphs (b)(1)(i) through (vii) of this section:

- (i) Finish type.
- (ii) Pounds (or density and volume) of each finish applied to the leather.
- (iii) Mass fraction of HAP in each applied finish.
- (iv) Date of the recorded entry.
- (v) Time of the recorded entry.
- (vi) Name of the person recording the entry.
- (vii) Product process operation type.

(2) Chemical Inventory Mass Balance. Not applicable.

[§63.5335(b) revised at 70 FR 6360, Feb. 7, 2005]

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(c) To determine the pounds of HAP loss for the previous month, you must first determine the pounds of HAP loss from each finish application according to paragraph (c)(1) or (2) of this section.

(1) For facilities not using add-on emission control devices, the entire HAP content of the finishes are assumed to be released to the environment. Using the finish inventory log, multiply the pounds of each recorded finish usage by the corresponding mass fraction of HAP in the finish. The result is the HAP loss in pounds from each finish application. Sum the pounds of HAP loss from all finish applications recorded during the previous month to determine the total monthly HAP loss in pounds from your finishing operation.

(2) For facilities using add-on emission control devices, DOES NOT APPLY.

(d) After collecting HAP loss data for 12 months, you must also determine by the fifteenth of each month the annual HAP loss in pounds by summing the monthly HAP losses for the previous 12 months. The annual HAP loss is the "actual HAP loss," which is used in Equation 1 of §63.5330 to calculate your compliance ratio, as described in §63.5330.

019 [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?

(a) By the fifteenth of each month, you must determine the allowable HAP loss in pounds from your leather finishing operation for the previous month.

(b) To determine the allowable HAP loss for your leather finishing operation, you must select the appropriate HAP emission limit, expressed in pounds of HAP loss per 1,000 square feet of leather processed, from Table 1 of this subpart, for each type of leather product process operation performed during the previous 12 months. Under the appropriate existing or new source column, select the HAP emission limit that corresponds to each type of product process operation performed during the previous 12 months. Next, determine the annual total of leather processed in 1,000's of square feet for each product process operation in accordance with §63.5400. Then, multiply the annual total of leather processed in each product process operation by the corresponding HAP emission limit to determine the allowable HAP loss in pounds for the corresponding leather product process operation. Finally, sum the pounds of HAP loss from all leather product process operations performed in the previous 12 months. Equation 1 of this section illustrates the calculation of allowable HAP loss as follows:

Equation 1 reads: Allowable HAP Loss = $\text{SUM}(i=1 \text{ to } n)(\text{Annual Total of Leather Processed}(i) \times \text{HAP Emission Limit}(i))$

Where:

Annual Total of Leather Processed = 1,000's of square feet of leather processed in the previous 12 months in product process operation "i".

HAP Emission Limit = From Table 1 of this subpart, the HAP emission limit in pounds of HAP loss per 1,000 square feet of leather processed for product process operation "i".

n = Number of leather products process operation types performed during the previous 12 months.

NOTE: A more accurate representation of Equation 1 can be found on page 9164 of the Federal Register dated February 27, 2002.

(c) The resulting "allowable HAP loss" is used in Equation 1 of §63.5330 to calculate your compliance ratio, as described in §63.5330.

020 [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?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

SECTION E. Source Group Restrictions.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

VII. ADDITIONAL REQUIREMENTS.

021 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.5285]

Subpart TTTT -- National Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations

Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a leather finishing operation that is a major source of hazardous air pollutants (HAP) emissions or that is located at, or is part of, a major source of HAP emissions. A leather finishing operation is defined in §63.5460. In general, a leather finishing operation is a single process or group of processes used to adjust and improve the physical and aesthetic characteristics of the leather surface through multistage application of a coating comprised of dyes, pigments, film-forming materials, and performance modifiers dissolved or suspended in liquid carriers.

(b) You are a major source of HAP emissions if you own or operate a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year.

(c) You are not subject to this subpart if your source finishes leather solely for the purpose of research and development.

022 [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?

(a) This subpart applies to each new, reconstructed, or existing affected source at leather finishing operations.

(b) The affected source subject to this subpart is the collection of all equipment and activities used for the multistage application of finishing materials to adjust and improve the physical and aesthetic characteristics of the leather surface. This subpart applies to the leather finishing operations listed in paragraphs (b)(1) through (4) of this section and as defined in §63.5460, whether or not the operations are collocated with leather tanning operations:

- (1) Upholstery leather with greater than or equal to 4 grams finish add-on per square foot of leather;
- (2) Not applicable.
- (3) Not applicable
- (4) Not applicable

(c) An affected source does not include portions of your leather finishing operation that are listed in paragraphs (c)(1) and (2) of this section:

- (1) Equipment used solely with leather tanning operations; and
- (2) That portion of your leather finishing operation using a solvent degreasing process, such as in the manufacture of leather chamois, that is already subject to the Halogenated Solvent Cleaning NESHAP (40 CFR part 63, subpart T).

(d) An affected source is a new affected source if you commenced construction of the affected source on or after October 2, 2000, and you meet the applicability criteria at the time you commenced construction.

(e) An affected source is reconstructed if you meet the criteria as defined in §63.2.

(f) An affected source is existing if it is not new or reconstructed.

023 [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?

SECTION E. Source Group Restrictions.

(b) If you have an existing affected source, you must comply with the emission standards for existing sources no later than February 28, 2005.

[40 CFR §63.5295(b)]

024 [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?

(a) Product process operations that finish leather for use in automobile and furniture seat coverings are categorized as an upholstery product process operation. There are two upholstery product process operations subject to the requirements of this subpart -- operations with less than 4 grams of finish add-on per square foot, and operations with 4 grams or more of finish add-on per square foot. You must distinguish between the two upholstery product process operations so that you can determine which HAP emission limit in Table 1 of this subpart applies to your affected source.

(b) You must determine finish add-on by calculating the difference in mass before and after the finishing process. You may use an empirical method to determine the amount of finish add-on applied during the finishing process, as described in paragraphs (b)(1) through (4) of this section:

(1) Weigh a one square foot representative section of polyester film, paper, cardstock, or equivalent material substrate to be finished. This will provide an initial mass and surface area prior to starting the finishing process.

(2) Use a scale with an accuracy of at least 5 percent of the mass in grams of the representative section of substrate.

(3) Upon completion of these measurements, process the representative section of substrate on the finishing line as you would for a typical section of leather.

(4) After the finishing and drying process, weigh the representative section of substrate to determine the final mass. Divide the net mass in grams gained on the representative section by its surface area in square feet to determine grams per square foot of finish add-on. Equation 1 of this section illustrates this calculation, as follows:

Equation 1 reads: $\text{Finish Add-On} = (\text{Final Mass} - \text{Initial Mass}) / (\text{Surface Area})$

Where:

Finish Add-On = Grams per square foot of finish add-on applied to a representative section of polyester film or equivalent material substrate.

Final Mass = Final mass in grams of representative section of polyester film or equivalent material substrate, after finishing and drying.

Initial Mass = Final mass in grams of representative section of polyester film or equivalent material substrate, prior to finishing.

Surface Area = Surface area in square feet of a representative section of polyester film or equivalent material substrate.

NOTE: A more accurate representation of Equation 1 can be found on page 9165 of the Federal Register dated February 27, 2002.

(c) Any appropriate engineering units may be used for determining the finish add-on. However, finish add-on results must be converted to the units of grams of finish add-on per square foot of leather processed. If multiple representative leather sections are analyzed, then use the average of these measurements for selecting the appropriate product process operation.

(d) For each leather product with a unique finish application, you must maintain records to support how the leather product was categorized to a product process operations type. You must repeat the leather product categorization to a product process operation type no less frequently than once every 5 years if the applied finish chemical characteristics of the leather product have not changed, or when the applied finish chemical characteristics of the leather product change, whichever is sooner.

[§63.5345(d) added to 70 FR 6360, Feb. 7, 2005]



SECTION E. Source Group Restrictions.

*** Permit Shield in Effect. ***

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 002

Group Description: Furnaces and Heaters

Sources included in this group:

ID	Name
032	(14) OIL FURNACES & (1) HOT WATER HEATER
033	MIXING ROOM FURNACE

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

001 [25 Pa. Code §123.13]

Processes

No person may permit particulate matter emissions from each of the above furnaces, into the outdoor atmosphere, in excess of 0.04 grains per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person shall permit the emission into the outdoor atmosphere of sulfur oxides from each of above furnaces in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** 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.

The following miscellaneous sources have been determined to have emissions that are insignificant and require no special permitting restrictions or requirements:

- (2) Hand sample spray booth
- (1) Emergency generator (fueled by FM005 - propane)
- (3) Chemistry lab hoods
- (1) Maintenance welding area vent
- (1) Fire pump (fueled by FM003 - diesel fuel)
- (1) Small roll coater cutting
- (1) Buffing unit (vented indoors)
- (1) Waste water treatment room
- (1) Wet/Dry toggling unit
- (2) Small roll coaters
- (2) Flammable liquids storage cabinets
- (1) Mixing room
- (1) Finishing room
- (1) Jumbostar reverse roll coater
- (2) Erretre milling drums
- (2) BAF small roll coaters
- (4) Kela steel mills

Miscellaneous Sources added since April 2003 Renewal:

- (2) Gibra Mini-Dust Machine In-line Dedusters
- (5) Erretre 3-Meter Steel Mills
- (5) Reznor Model F-100 Propane Heaters
- (1) Temporary Wastewater Pre-Treatment Plant
- (2) Leather Wrapping-Spray Booth & Rollcoaters
- Coloring/Wet End Expansion equipment



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