



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: May 12, 2021

Effective Date: June 1, 2021

Expiration Date: May 31, 2026

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 unless otherwise designated.

State Only Permit No: 07-05037

Synthetic Minor

Federal Tax Id - Plant Code: 04-1127910-2

Owner Information

Name: COVE SHOE CO
Mailing Address: 107 HIGHLAND ST
MARTINSBURG, PA 16662-1424

Plant Information

Plant: HH BROWN SHOE CO/COVE SHOE MARTINSBURG
Location: 07 Blair County 07917 Martinsburg Borough
SIC Code: 3143 Manufacturing - Men'S Footwear, Except Athletic

Responsible Official

Name: VICTOR L SANDERS
Title: VP, COO
Phone: (814) 793 - 3786 Email:

Permit Contact Person

Name: SCOTT RHODES
Title: DIR HR & SAFETY
Phone: (814) 793 - 3786 Ext.5126 Email:

[Signature] _____
WILLIAMR. WEAVER, SOUTHCENTRAL REGION AIR PROGRAMMANAGER



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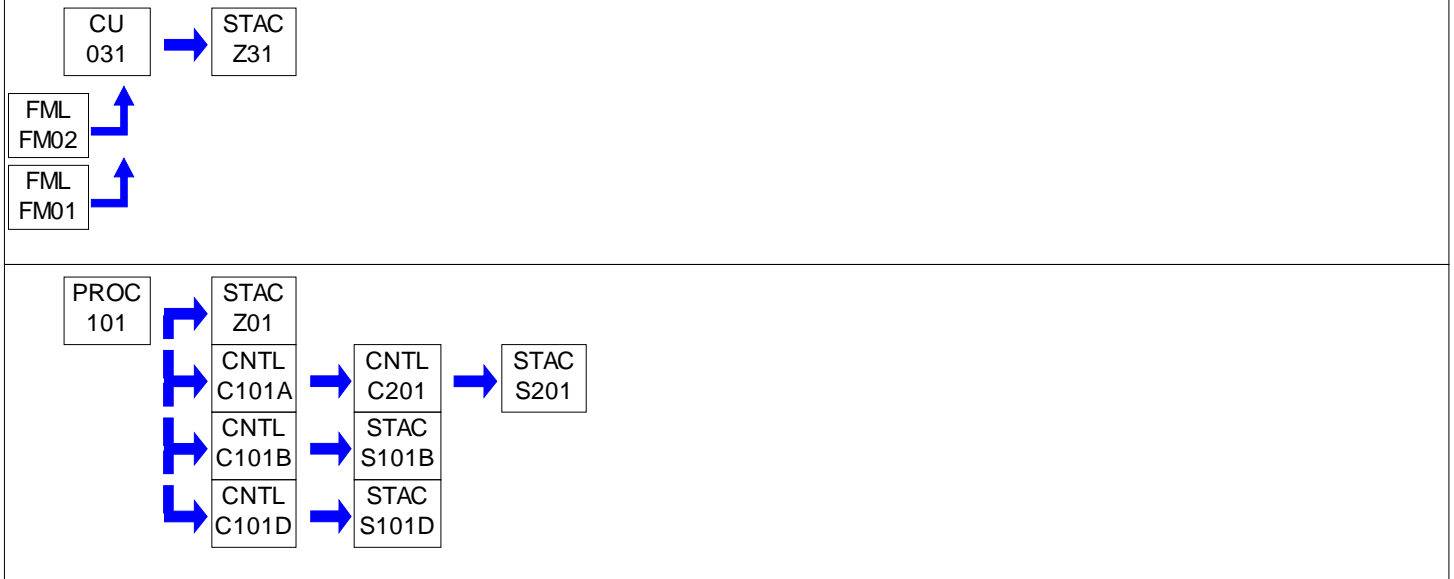
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SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	SPACE HEATERS	6.500 MMBTU/HR	
101	SHOE MANUFACTURING		
C101A	CYCLONE #1		
C101B	CYCLONE #2		
C101D	CYCLONE #4		
C201	FABRIC COLLECTOR		
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FM02	PROPANE		
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S201	FABRIC COLLECTOR STACK		
Z01	FUG. VOC EMISSIONS		
Z31	COMBUSTION FUG. EMISS.		

PERMIT MAPS



**SECTION B. General State Only 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 in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]**Operating Permit Duration.**

- (a) 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.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating 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.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]**Permit Renewal.**

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.
- (d) 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.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]**Operating Permit Fees under Subchapter I.**

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
- (1) For a synthetic minor facility, a fee equal to:
- (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
 - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
 - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

SECTION B. General State Only Requirements

(2) For a facility that is not a synthetic minor, a fee equal to:

- (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
- (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
- (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.

(b) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]**Transfer of Operating Permits.**

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

(b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and 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 a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

#006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]**Inspection and Entry.**

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

(1) Enter at reasonable times upon the permittee's premises where a 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, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any 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, any 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 or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

(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 §§ 127.441 & 127.444]**Compliance Requirements.**

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

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- (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 for the source is 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 State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]**Need to Halt or Reduce Activity Not a Defense.**

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

#009 [25 Pa. Code §§ 127.442(a) & 127.461]**Duty to Provide Information.**

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]**Revising an Operating Permit for Cause.**

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

#011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]**Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:

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(b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.

(e) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

#012 [25 Pa. Code § 127.441]**Severability Clause.**

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

#013 [25 Pa. Code § 127.449]**De Minimis Emission Increases.**

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. 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.

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

(c) Except as provided below in (d), the permittee is authorized 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, the regulations thereunder 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, the regulations thereunder or 25 Pa. Code Article III.

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

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

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- (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 or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) 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 (c)(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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (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, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making 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.

#014 [25 Pa. Code § 127.3]**Operational Flexibility.**

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (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)

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(6) Section 127.462 (relating to minor operating permit modifications)

(7) Subchapter H (relating to general plan approvals and general operating permits)

#015 [25 Pa. Code § 127.11]**Reactivation**

(a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).

(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).

#016 [25 Pa. Code § 127.36]**Health Risk-based Emission Standards and Operating Practice Requirements.**

(a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].

(b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

#017 [25 Pa. Code § 121.9]**Circumvention.**

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 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#018 [25 Pa. Code §§ 127.402(d) & 127.442]**Reporting Requirements.**

(a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

(c) 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 in the permit transmittal letter, or otherwise notified)

(d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

(e) Any records, reports or information submitted to the Department shall be available to the public except for such

**SECTION B. General State Only Requirements**

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#019 [25 Pa. Code §§ 127.441(c) & 135.5]**Sampling, Testing and Monitoring Procedures.**

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#020 [25 Pa. Code §§ 127.441(c) and 135.5]**Recordkeeping.**

(a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:

- (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 any 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.

#021 [25 Pa. Code § 127.441(a)]**Property Rights.**

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

#022 [25 Pa. Code § 127.447]**Alternative Operating Scenarios.**

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.

**SECTION B. General State Only Requirements****#023 [25 Pa. Code §135.3]****Reporting**

(a) If the facility is a Synthetic Minor Facility, the permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active 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. All air emissions from the facility should be estimated and reported.

(b) A source owner or operator of a Synthetic Minor Facility may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#024 [25 Pa. Code §135.4]**Report Format**

If applicable, the emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

**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 any fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of building or structure.
- (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 material.
- (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 standard.

002 [25 Pa. Code §123.2]**Fugitive particulate matter**

No person shall permit the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001, if the emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]**Limitations**

No person 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 limitation of 25 Pa. Code §123.41 shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitation;
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (c) The emission results from sources specified in Section C, Condition #001, subsections (a)(1)-(a)(7).

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the facility's total actual emissions below the following levels to maintain the facility's synthetic minor status:

- (a) 100 tons per year of sulfur oxides
- (b) 100 tons per year of nitrogen oxides
- (c) 100 tons per year of carbon monoxide
- (d) 100 tons per year of PM-10 (particulate matter with an effective aerodynamic diameter of less than or equal to a nominal 10 micrometer body as measured by the applicable reference method or an equal method)
- (e) 50 tons per year of volatile organic compounds
- (f) 10 tons per year of any individual hazardous air pollutant
- (g) 25 tons per year of total combined hazardous air pollutants

The above emission limits apply to each consecutive 12-month period. Compliance verification requires emissions to be calculated for each month and each consecutive 12-month period. These records shall be maintained on-site and made available to the Department upon request.

007 [25 Pa. Code §129.14]**Open burning operations**

(a) No person shall conduct open burning of materials 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 Subsection (a) do 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 official.
- (2) Any 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 does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.

SECTION C. Site Level Requirements**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 referenced in this permit to measure emissions for purposes including verification of permit condition compliance and estimation of annual air emissions.

009 [25 Pa. Code §139.1]**Sampling facilities.**

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

010 [25 Pa. Code §139.11]**General requirements.**

(a) As specified in 25 PA Code Section 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(b) As specified in 25 PA Code Section 139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, at a minimum, all of the following:

- (1) A thorough source description, including a description of any air cleaning devices and the flue.
- (2) Process conditions, for example, the throughput rate of foundry production, and other conditions which may affect emissions from the process.
- (3) The location of the sampling ports.
- (4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage CO, CO₂, O₂, and N₂), static and barometric pressures.
- (5) Sample collection techniques employed, including procedures used, equipment descriptions, and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
- (6) Laboratory procedures and results.
- (7) Calculated results.

III. MONITORING REQUIREMENTS.**# 011 [25 Pa. Code §123.43]****Measuring techniques**

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

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

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

- (a) Stack emissions in excess of the limits stated in Section C, Condition #004. Visible stack emissions may be measured according to the methods specified in Section C, Condition #011, or alternately, plant personnel who observe

**SECTION C. Site Level Requirements**

visible stack emissions may report the incidence of visible stack emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible stack emissions.

(b) The presence of fugitive visible emissions beyond the plant property boundaries, as stated in Section C, Condition #002.

(c) The presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition #003.

IV. RECORDKEEPING REQUIREMENTS.**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of monthly inspections conducted in accordance with Section C, Condition #012. At a minimum, these records shall include the following information:

- (1) The name of the company representative conducting each inspection.
- (2) The date and time of each inspection.
- (3) The wind direction during each inspection.

The permittee shall maintain these records for a minimum of five years and shall make them available to the Department upon request.

V. REPORTING REQUIREMENTS.**# 014 [25 Pa. Code §127.442]****Reporting requirements.**

The permittee shall report malfunctions 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 usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(a) The permittee shall report malfunctions which occur at the 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:

(1) Malfunctions which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. Telephone reports can be made to the Air Quality Program at 717-705-4700 or (814) 949-7290 during normal business hours, or to the Department's Emergency Hotline 1800-541-2050 at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) days of the telephone report.

(2) 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.

VI. WORK PRACTICE REQUIREMENTS.**# 015 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne from any source specified in Section C, Condition #001(a)(1) through (a)(7). These actions shall include, but are not limited to, the following:

SECTION C. Site Level Requirements

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

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All air pollution sources and air pollution control devices shall be operated and maintained in accordance with manufacturer's recommendations and good pollution control practices that minimize air emissions.

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

SECTION D. Source Level Requirements

Source ID: 031

Source Name: SPACE HEATERS

Source Capacity/Throughput: 6.500 MMBTU/HR

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate these sources on commercial natural gas and propane only.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

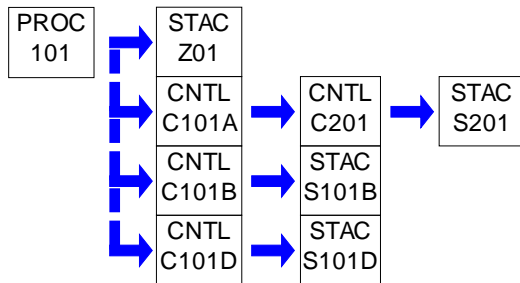
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

SECTION D. Source Level Requirements

Source ID: 101

Source Name: SHOE MANUFACTURING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 01
02**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The total VOC emissions shall not exceed 0.14 pounds of VOC emitted per pair of shoes produced (0.14 lbs VOC/pair produced) during any consecutive 12 month period.

[The above requirement was derived from Operating Permit No. 07-02028]

002 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall not allow the particulate matter emissions being discharged to the atmosphere from the fabric collector associated with the scouring and edge trimming operation to exceed 0.02 grains per dry standard cubic foot.

003 [25 Pa. Code §129.63a]**Control of VOC emissions from industrial cleaning solvents.**

The annual VOC emissions from the cleanup solvents used in shoe manufacturing shall not exceed 2.7 tons based on any consecutive 12-month period, to preclude applicability the Section 129.63a.

II. TESTING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain sufficient records of the following data for all VOC containing chemicals used at the facility:

- (a) chemical stock number/name and manufacturer
- (b) chemical use (e.g., cleaner)

**SECTION D. Source Level Requirements**

- (c) density in pounds per gallons
- (d) VOC constituent(s) of each chemical used
- (e) percent solvents (by weight) of the VOC constituent(s) of each chemical
- (f) gallons per month of the chemical used during each calendar year
- (g) pounds per year of VOC emissions from each chemical
- (h) monthly VOC emissions, in pounds, for the reporting period
- (i) total VOC emissions, in pounds, for the reporting period
- (j) monthly shoe production, in pairs, for the reporting period
- (k) pounds of VOC emitted per pair of shoes produced on a monthly basis and overall total for the reporting period
- (l) total days and hours of production for the reporting period

Weekly records shall also contain the following information on cleanup solvents:

- (a) solvent identification
- (b) solvent density
- (c) percent water (volume)
- (d) gallons per month of solvent used during the reporting period
- (e) pounds per year of VOC emissions

These records shall be maintained on-site for a minimum of five (5) years and shall be made available to the Department upon request.

[The above requirements were derived from Operating Permit No. 07-02028]

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain sufficient records of the following data for all cleanup solvents sent off-site for either recycling or incineration at a legally permitted facility, the following information will be required:

- (a) the quantities being disposed of
- (b) the VOC content of the cleanup solvents being disposed of
- (c) documentation to verify the above

These records shall be maintained on-site for a minimum of five (5) years and shall be made available to the Department upon request.

[The above requirement was derived from Operating Permit No. 07-02028]

006 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

Manufacturer supplied VOC Data Sheets and/or Material Safety Data Sheets for all chemicals used and cleanup solvents utilized at the facility within the most recent five (5) years shall be maintained at the facility; this information shall be available to the Department upon request.

[The above requirement was derived from Operating Permit No. 07-02028]

V. REPORTING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(1) For all VOC containing chemicals used at the facility, annual reports containing, but not limited to the following data, shall be submitted to the Department's District Supervisor:

- (a) chemical stock number/name and manufacturer
- (b) chemical use (e.g., cleaner)
- (c) density in pounds per gallons

**SECTION D. Source Level Requirements**

- (d) VOC constituent(s) of each chemical used
- (e) percent solvents (by weight) of the VOC constituent(s) of each chemical
- (f) gallons per month of the chemical used during each calendar year
- (g) pounds per year of VOC emissions from each chemical
- (h) monthly VOC emissions, in pounds, for the reporting period
- (i) total VOC emissions, in pounds, for the reporting period
- (j) monthly shoe production, in pairs, for the reporting period
- (k) pounds of VOC emitted per pair of shoes produced on a monthly basis and overall total for the reporting period
- (l) total days and hours of production for the reporting period

Each report (January 1 through December 31) is due no later than March 1 of the following year for each operating year authorized by the operating permit or its renewal.

(2) The annual report shall also contain the following information on cleanup solvents:

- (a) solvent identification
- (b) solvent density
- (c) percent water (volume)
- (d) gallons per month of solvent used during the reporting period
- (e) pounds per year of VOC emissions

(3) Should credit be desired for cleanup solvents sent off-site for either recycling or incineration at a legally permitted facility, the following information will be required:

- (a) the quantities being disposed of
- (b) the VOC content of the cleanup solvents being disposed of
- (c) documentation to verify the above

[The above requirements were derived from Operating Permit No. 07-02028]

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The spray booth operations shall install, use, and maintain high-volume, low-pressure (HVL) spray guns for the application of VOC containing chemicals.

[The above requirement was derived from Operating Permit No. 07-02028]

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Storage buckets, containers, etc. used for the storage, transfer or use of VOC containing chemicals, spent clean-up solvent or spent wiping rags shall be equipped with self-closing safety lids, where applicable. If self-closing safety lids are not available or practical, the company shall take adequate measures to ensure that such containers are closed in such a manner that prevent excessive emissions of VOC.

[The above requirement was derived from Operating Permit No. 07-02028]

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The production activities, at the facility, shall not exceed 3,000 hours during any consecutive 12-month period.

[The above requirement was derived from Operating Permit No. 07-02028]



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION E. Source Group Restrictions.**

Group Name: 01

Group Description: 25 Pa. Code § 129.77 Requirements, Adhesives for Specialty Shoes

Sources included in this group

ID	Name
101	SHOE MANUFACTURING

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.**# 001 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

§ 129.77. Control of emissions from the use or application of adhesives, sealants, primers and solvents.

(a) This section applies to the owner or operator of a facility that uses or applies one or more of the following at the facility on or after January 1, 2012:

- (1) An adhesive, sealant, adhesive primer or sealant primer subject to the VOC content limits in Table V.

TABLE V REQUIREMENTS

VOC CONTENT LIMITS FOR ADHESIVES, SEALANTS, ADHESIVE PRIMERS AND SEALANT PRIMERS, AS APPLIED

Adhesive, sealant, adhesive primer or sealant primer category;
VOC content limit (pounds VOC per gallon, less water and exempt compounds);

Adhesives, contact bond: 2.1

Sealants, other: 3.5

END OF TABLE V REQUIREMENTS

**SECTION E. Source Group Restrictions.**

(2) [NA – TABLE V APPLIES]

(3) A surface preparation solvent or cleanup solvent.

(b) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility an adhesive, sealant, adhesive primer or sealant primer that exceeds the applicable VOC content limit in Table V or VI, except as provided elsewhere in this section.

(c) On or after January 1, 2012, an owner or operator of a facility may not use or apply at the facility a surface preparation or cleanup solvent that exceeds the applicable VOC content limit or composite partial vapor pressure requirements of this section, except as provided elsewhere in this section.

(d) The VOC content limits in Table VI for adhesives or sealants applied to particular substrates apply as follows:

(1) If an owner or operator of a facility uses or applies at the facility an adhesive or sealant subject to a specific VOC content limit in Table V, the specific limit is applicable rather than the adhesive-to-substrate limit in Table VI.

(2) If an owner or operator of a facility uses or applies at the facility an adhesive to bond dissimilar substrates together, the applicable substrate category with the highest VOC content limit is the limit for this use.

(e) An owner or operator of a facility subject to this section using or applying a surface preparation solvent or cleanup solvent at the facility may not:

(1) [NA – NO SOLVENTS USED FOR SURFACE PREPARATION]

(2) [NA – PROCESS DOES NOT INVOLVE SINGLE PLY ROOF MEMBRANE]

(3) Except as provided in subsection (f), use cleanup solvent materials containing VOCs for the removal of adhesives, sealants, adhesive primers or sealant primers from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20° C.

(f) [NA – SPRAY APPLICATION EQUIPMENT NOT USED]

(g) [NA – NO ADD-ON CONTROLS]

(h) An owner or operator of a facility subject to this section shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives, sealants, primers, surface preparation solvents or cleanup solvents subject to this section, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container.

(i) An owner or operator of a facility subject to this section may not solicit, require or specify the use or application of an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the use or application would result in a violation of this section, unless the emissions are controlled through the use of add-on air pollution control equipment as specified in subsection (g). The prohibition of this subsection applies to all written or oral contracts created on or after January 1, 2012, under which an adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent subject to this section is to be used or applied at a facility in this Commonwealth.

(j) An owner or operator of a facility subject to this section who uses or applies an adhesive, sealant, adhesive primer or sealant primer subject to this section may not add solvent to the adhesive, sealant, adhesive primer or sealant primer in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive, sealant, adhesive primer or sealant primer to exceed the applicable VOC content limit listed in Table V or VI, unless the emissions are controlled through the use of add-on air pollution control equipment as specified in subsection (g).

(k) This section does not apply to the use or application of the following compounds or products:

(1) Adhesives, sealants, adhesive primers or sealant primers being tested or evaluated in a research and development, quality assurance or analytical laboratory, if records are maintained as required in subsections (p) and (q).

**SECTION E. Source Group Restrictions.**

(2) [NA – ADHESIVES USED ARE NOT REGULATED ELSEWHERE IN CHAPTER 129 AND ARE NOT CONSUMER PRODUCTS UNDER CHAPTER 130]

(3) Adhesives and sealants that contain less than 20 grams of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied.

(4) Cyanoacrylate adhesives.

(5) Adhesives, sealants, adhesive primers or sealant primers that are sold or supplied by the manufacturer or supplier in containers with a net volume of 16 fluid ounces or less, or a net weight of 1 pound or less, except plastic cement welding adhesives and contact adhesives.

(6) Contact adhesives that are sold or supplied by the manufacturer or supplier in containers with a net volume of 1 gallon or less.

(l) [NA – LISTED EXEMPTIONS DO NOT APPLY]

(m) [NA – ADHESIVE APPLICATION > 200 LB/YR]

(n) This section does not apply to the use or application of a noncomplying adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the total volume of noncomplying adhesives, sealants, primers, surface preparation and cleanup solvents used or applied facility-wide does not exceed 55 gallons per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption, in accordance with subsections (o)—(q).

(o) Except as provided in subsection (p), each owner or operator subject to this section shall maintain records demonstrating compliance with this section, including the following information:

(1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product in use and in storage.

(2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (1).

(3) The VOC content of each product on the list required under paragraph (1), as supplied.

(4) Catalysts, reducers or other components used and the mix ratio.

(5) The VOC content or vapor pressure of each product on the list required by paragraph (1), as applied, if solvent or other VOC is added to the product before application.

(6) The volume purchased or produced of each product on the list required under paragraph (1).

(7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (1).

(p) For an adhesive, sealant, adhesive primer and sealant primer product subject to the laboratory testing exemption of subsection (k)(1), the person conducting the testing shall make and maintain records of all products used, including the following information:

(1) The product name.

(2) The product category of the material or type of application.

(3) The VOC content of the material.

(q) Records made to determine compliance with this section shall be:

SECTION E. Source Group Restrictions.

- (1) Maintained onsite for 5 years from the date the record is created.
- (2) Made available to the Department upon receipt of a written request.
- (r) Except as otherwise provided in this section, the VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone adhesives), sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents shall be determined using one of the following:
 - (1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.
 - (2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (s) The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63, Subpart PPPP, Appendix A, including updates and revisions.
- (t) The identity and concentration of exempt organic compounds shall be determined using one of the following:
 - (1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.
 - (2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (u) The VOC content of a plastic cement welding adhesive or primer shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (v) To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.
- (w) The composite partial vapor pressure of organic compounds in cleaning materials shall be determined by the following procedure:
 - (1) Quantifying the amount of each compound in the blend using gas chromatographic analysis, using the following methods:
 - (i) ASTM E260, Standard Practice for Packed Column Gas Chromatography, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for organic content, including updates and revisions.
 - (ii) ASTM D3792, Standard Test Method for Water Content of Coatings by Direct Injection Into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, for water content, including updates and revisions.
 - (2) Calculating the composite partial vapor pressure using the following equation: [SEE REGULATION FOR EQUATION]
- (x) The vapor pressure of each single component compound shall be determined from one or more of the following:
 - (1) ASTM D2879, Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA, including updates and revisions.

SECTION E. Source Group Restrictions.

(2) The most recent edition of one or more of the following sources:

- (i) Vapour Pressures of Pure Substances, Boublik, Elsevier Scientific Publishing Company, New York.
- (ii) Perry's Chemical Engineers' Handbook, Green and Perry, McGraw-Hill Book Company.
- (iii) CRC Handbook of Chemistry and Physics, CRC Press.
- (iv) Lange's Handbook of Chemistry, McGraw-Hill Book Company.
- (v) Additional sources approved by the SCAQMD or other California air districts.

(y) [NA – NO ADD-ON CONTROLS]

(z) [NA – NO SPRAY EQUIPMENT]

(aa) Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

- (1) The request is submitted to the Department in writing.
- (2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.
- (3) The Department approves the request in writing.

(bb) For adhesive, sealant, adhesive primer or sealant primer products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation: [SEE REGULATION FOR EQUATION]

(cc) For adhesive, sealant, adhesive primer or sealant primer products that contain reactive diluents, the VOC content of the product is determined after curing. The grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation: [SEE REGULATION FOR EQUATION]

(dd) For low-solids adhesive, sealant, adhesive primer or sealant primer products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation: [SEE REGULATION FOR EQUATION]

(ee) Percent VOC by weight shall be calculated according to the following equation: [SEE REGULATION FOR EQUATION]

(ff) To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345×10^{-3} (lb/gal/g/l).

**SECTION E. Source Group Restrictions.**

Group Name: 02

Group Description: VOC Emissions Averaging Pursuant to § 129.51

Sources included in this group

ID	Name
101	SHOE MANUFACTURING

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee may use the following emissions averaging approach, as an alternative to meeting the requirements of 25 Pa. Code Section 129.77, Group 01, Condition #001(a):

(1) If the emissions averaging approach is used, the permittee shall use it in order to demonstrate compliance for all applied adhesives and sealants, used on a facility-wide basis, whether compliant or non-compliant. Calculations shall exclude water and exempt compounds.

(2) Adhesive: Total allowable emissions for adhesives, contact bond (AEa) shall be calculated as follows on a monthly basis:

$$AEa = [\text{sum } i \text{ for each contact bond adhesive}]: (2.1 \times \text{Volume } i)$$

Sealant: Total allowable emissions for sealants, other (AEs) shall be calculated as follows on a monthly basis:

$$AEs = [\text{sum } i \text{ for each sealant}]: (3.5 \times \text{Volume } i)$$

(3) Total actual emissions (TAE) shall be calculated as follows on a monthly basis:

$$\text{Adhesives: } TAEa = [\text{sum } i \text{ for each contact bond adhesive}]: (\text{Volume } i \times \text{Density } i \times \text{Weight Fraction VOC } i)$$

$$\text{Sealants: } TAEs = [\text{sum } i \text{ for each sealant}]: (\text{Volume } i \times \text{Density } i \times \text{Weight Fraction VOC } i)$$

(4) TAEa + TAEs shall be less than or equal to AEa + AEs.

**SECTION E. Source Group Restrictions.**

(5) The permittee shall keep the following records:

(i) Daily records of the following data for each adhesive and sealant:

- (A) name of adhesive /unique identification code;
- (B) name of sealant /unique identification code;
- (D) volume;
- (C) density;
- (E) the solids content in percent by volume;
- (F) VOC content in percent by weight; and,

(ii) Monthly calculations to verify that the total equivalency actual emission are less than or equal to the allowable emissions.

(6) The permittee shall submit annual reports of the calculations verifying that $TAEa + TAEs$ is less than or equal to $AEa + AEs$. The annual reports shall be submitted to DEP no later than March 1 for the previous calendar year.

[Additional authority for this condition is derived from 25 Pa Code Section 129.51]

VII. ADDITIONAL REQUIREMENTS.

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.



SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

#001: Source 101, Shoe Manufacturing is composed of the following operations:

Factory A:

Cutting Department:

- One (1) Block Planer
- Two (2) Leather Splitter

Pre-Fit Department:

- One (1) Ink Spray Station
- Five (5) Latex Cement Station
- One (1) Spraymation Hot-Melt Station

Fitting Department:

- Two (2) Box-Toe Attachment Stations
- One (1) Latex Cement Stations
- Three (3) Flame Treating Stations
- Seven (7) Back Part Molders

Set-Up Department

Lasting Department:

- Two (2) Hand Spray Stations
- Two (2) Spraymation Hot-Melt Stations
- Two (2) Inspection/Heel Forming Stations
- One (1) Roughing Machine

Making Department:

- Three (3) Bottom Cement Stations
- Three (3) Hot-Melt Cement Stations
- Three (3) Bottom Fill Stations
- Two (2) Welt Beater
- One (1) Sander
- Two (2) Wire Brush Stations

Finishing Department:

- Two (2) Mid-Sole Cement Station
- Seven (7) Scouring Stations
- One (1) Heel Shaving Station
- Three (3) Edge Trimming Stations
- One (1) Brest Scouring Machine

Packing Department:

- Two (2) Dusting Stations
- One (1) Form and Flame Units
- One (1) Edge Inking Stations
- Three (3) Dressing Stations
- Thirteen (13) Inspection and Repair Stations
- One (1) Top Spray Booths
- Five (5) Burnishing/Brushing Stations

Sole Department:

- Three (3) Mid-Sole Cement Stations
- One (1) Priming Station
- One (1) Automated Outsole Rink System
- Two (2) Insole Cement Station
- One (1) Garfas Machine
- One (1) Wire Brush Stations
- Four (4) Sole Sanding Station

**SECTION H. Miscellaneous.**

- Three (3) Cement Outsole Line
- One (1) Hot-Melt Cement Station

FACTORY B:

Pre-Fit Department:

- One (1) Hot-Melt Station
- One (1) Roll Coater

#002. The following sources and activities are not subject to any specific work practice standards, testing, monitoring, recordkeeping or reporting requirements:

1. Plant maintenance (painting, welding, woodworking, cleaning)
2. Laboratory/analytical activities



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