

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Horween Leather Company
Attn: Arnold Horween, Jr.
2015 North Elston Avenue
Chicago, Illinois 60614

Application No.: 95120131 I.D. No.: 031600EET
Applicant's Designation: Date Received: December 7, 1995
Operation of: Leather Tanning and Finishing
Date Issued: December 6, 1999 Expiration Date²: December 6, 2004
Source Location: 2015 North Elston Avenue, Chicago, Cook County
Responsible Official: Arnold Horween, Jr.

This permit is hereby granted to the above-designated Permittee to OPERATE a leather tanning and finishing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DGP:jar

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

² Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Horween Leather Company
2015 North Elston Avenue
Chicago, Illinois 60614
773/772-2026

I.D. No.: 031600EET
Standard Industrial Classification: 3111, Leather Tanning and
Finishing

1.2 Owner/Parent Company

Horween Leather Company
2015 North Elston Avenue
Chicago, Illinois 60614

1.3 Operator

Horween Leather Company
2015 North Elston Avenue
Chicago, Illinois 60614

Arnold Horween, Jr.
773/772-2026

1.4 General Source Description

Horween Leather Company is located at 2015 North Elston Avenue, Chicago in Cook County. The source processes and finishes leather. Horse hides received are processed through Cordovan Leather Processing into specialty leathers. Cattle hides received at the source are produced into specialty leather and standard leather. All cattle hides are washed, limed, de-haired, and chrome tanned to remove naturally occurring oils which must be replaced. Oils are replaced by fat liquoring or hot stuffing. Leather is then dried, and may undergo buffing, staking, and splitting to prepare it for finishing. In the cattle leather finishing process, various types of leather coatings, or finishes are applied depending upon the type of leather being produced. Coating operation include spraying, machine brushing and hand brushing of coatings onto leather. Drying techniques involve gas fired low heat dryers, steam heated low heat dryers, and hang drying rooms.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
°F	Degree Fahrenheit
ft	foot
ft ³	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
l	Liter
lb	pound
m	meter
MACT	Maximum Available Control Technology
mcf	Million Cubic Feet
MG	Megagram
mmBtu	Million British thermal units
mo	Month
MW	Mega Watt
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Tons
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt. %	Weight Percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Oxidation Pit
Water Treatment Plant
Two Maintenance Cold Cleaning Tanks

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Four Hair Removal Mixers

Nine Fat Liquor (Coloring) Mills

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Equipment used for the melting or application of less than 50,000 lbs/year of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or

blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Spray Booth #1 (SB-1)	Leather Coating Booth	Pre-1954	Built in Water Curtain
Hot Air Dryer #1 (HAD1)	Drying of Coated Leather	Pre-1954	None
Spray Booth #2 (SB-2)	Leather Coating Booth	Early 1970's	Built in Water Curtain
Hot Air Dryer #2 (HAD2)	Drying of Coated Leather	Early 1970's	None
Brush Finishing #1 (BF1)	Leather Coating	1958	None
Finish Dryer (FIRD)	Drying of Coated Leather	1970	None
Brush Finishing #2 (BF2)	Leather Coating	Pre 1954	None
Stick Dryer	Drying of Coated Leather	Pre 1954	None
Hang Drying Room #1 (HDR)	Drying of Damp Leather	Pre 1959	None
Hang Drying Room #2 (HDR)	Drying of Damp Leather	Pre 1959	None
Hang Drying Room #3 (HDR)	Drying of Damp Leather	Pre 1959	None
	Miscellaneous Emission Units, Including Solvent Cleanup		None
Pasting Room Dryer (PRD)	Drying Wet Sides of Leather	1960	None
Cordovan Leather Process (CDLP)	Cordovan Leather Processing	1930	None
Buffer #1 (B1)	Sanding of Leather	1960	Baghouse (BH)
Buffer #2 (B2)	Sanding of Leather	1980	Whirl-Wet Dust Collector (WWDC)
Buffer #3 (B3)	Sanding of Leather	1993	Baghouse (BH)
Touch-up Buffer #1 (TUB1)	Touch-up Sanding of Leather	1954	Baghouse (BH)
Touch-up Buffer #2 (TUB2)	Touch-up Sanding of Leather	1954	Baghouse (BH)
Union Boiler #1 (UB1)	19 mmBtu/hr Gas/Oil Fired Boiler	Pre 1967	None
Union Boiler #2 (UB2)	19 mmBtu/hr Gas/Oil Fired Boiler	Pre 1967	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Kemco Water Heater (KWH)	17.5 mmBtu/hr Gas Fired Water heater	September, 1989	None
Three Natural Gas Fired Dryers (HAD2, PRD, FIRD)	Three Natural Gas Fired Units Rated at 2.0 mmBtu/hr, 5 mmBtu/hr, and 1 mmBtu/hr, respectively.	Pre-1971	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular

basis, as needed, in accordance with the operating program established under 35 IAC 212.309 [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the

applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. The Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section;
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	99.12
Sulfur Dioxide (SO ₂)	3.58
Particulate Matter (PM)	10.62
Nitrogen Oxides (NO _x)	13.63
HAP, not included in VOM or PM	0.00
TOTAL	126.95

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitation for HAPs as listed in Section 112 (b) of the CAA are not set. This source is considered to be major source of HAPs. There are source-wide limitations on VOM in Condition 5.5.1 that include HAP emissions.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR

52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

In addition to individual limits in Condition 7.2.6 and 7.3.5, VOM emissions from all units subject to 35 IAC 218 Subpart PP that do not meet the control requirements of 35 IAC 218.926 shall not exceed 5.0 tons/yr. This is to qualify for the provision in 35 IAC 218.920(d).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. Total annual VOM emissions on a calendar year basis for all emission units qualifying for the provisions in 35 IAC 218.920(d) which states that the control requirements of Section 218.926 do not apply if total annual VOM emissions from all units not complying with Section 218.926 do not exceed 5.0 tons per calendar year.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records

retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information including HAPs for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. Total VOM emissions from the source shall be calculated based on the following:

$$E_T = E_c + E_o$$

Where:

E_T = Total VOM emissions, in tons/month

E_c = VOM emissions from all coatings, in tons/month

E_o = VOM emissions from all other VOM-containing materials (e.g., cleanup solvents), in tons/month

and

$$E_c = \sum_{i=1}^n U_i V_i D_i$$

Where:

U_i = Usage of coating i , in gallons/month

V_i = Overall VOM content of coating i , in weight percent

D_i = Density of coating i , in lb/gal

and the summation ' ' is over all coatings i ; and

$$E_o = \sum_{j=1}^n U_j V_j D_j$$

Where:

U_j = Usage of VOM-containing material j , in gal/month

V_j = VOM content of VOM-containing material j , in weight percent

D_j = Density of VOM-containing material j , in lb/gal

and the summation ' ' is over all VOM-containing materials j (other than coatings).

- b. HAP Emissions = VOM emissions calculated in "a" above times wt. % of each specific HAP material.

Total HAP emissions is sum for all specific HAP materials.

- c. Gas combustion emissions for units with firing rate less than 10 mmBtu/hr.

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100.0
CO	21.0
PM	11.9
VOM	2.8
SO ₂	0.6

These are emission factors for uncontrolled natural gas combustion for commercial boilers (0.3

mmBtu/hr - 10 mmBtu/hr), Tables 1.4.1, 1.4.2 and 1.4.3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC), factor corrected for 52% methane.

- d. Gas combustion emissions for units with firing rate between 10 mmBtu/hr and 100 mmBtu/hr.

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	140.0
CO	35.0
PM	14.0
VOM	2.8
SO ₂	0.6

These are emission factors for uncontrolled natural gas combustion for small industrial boilers (10 mmBtu/hr - 100 mmBtu/hr), Tables 1.4.1, 1.4.2 and 1.4.3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC), factor corrected for 52% methane.

- e. Fuel oil #6 combustion emissions for units with firing rate between 10 mmBtu/hr and 100 mmBtu/hr

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10³ gal)</u>
NO _x	55.0
CO	5.0
PM	9.19S*+ 3.22
VOM	0.28
SO ₂	157S*

* S indicates the weight% of sulfur in the fuel

These are emission factors for uncontrolled fuel oil #6 combustion for small industrial boilers (10 mmBtu/hr - 100 mmBtu/hr), Tables 1.3.1, 1.3.2, AP-42, Volume I, Supplement F, October, 1996.

- f. Particulate matter emissions from buffing operation.

Particulate matter generated by buffers multiplied by the control efficiency of the baghouse and whirl wet dust collector controlling the buffers.

$$(\text{PM generated}) \times \left(1 - \frac{\text{Control Efficiency}}{100}\right)$$

PM Generated = Amount of leather treated in buffers x 0.0067 + amount of leather treated in touch-up buffers x 0.0033

- g. Particulate matter emissions from spray booth coating operation.

$$\left[(\text{Lbs of Solids in Coating}) \times (\% \text{ Overspray}) \times \left(1 - \frac{\text{Control Equipment Efficiency}}{100}\right) \right]$$

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630). Note: This narrative description of the ERMS is provided for informational purposes and is not intended to be enforceable as a legal matter. Refer to the ERMS, 35 IAC Part 205, and the provisions thereunder for enforceable requirements of the ERMS.

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203 on or after May 1, 1999, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the preceding seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior

to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for each of its Transaction Accounts, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source to or from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. For the second consecutive seasonal allotment period in which an emission excursion occurs, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Permittee may apply to the Illinois EPA to request

that ATUs in an amount equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates which are achieved during normal operating conditions that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

- iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 281 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 30.32 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

- iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. A copy of its seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Copies of any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Combustion Units

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units are BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

Speciality Leather Coating

7.0 UNIT SPECIFIC CONDITIONS

- 7.1 Unit 1 Spray Booth #1 for leather coating with a hot air dryer.
- Unit 2 Spray Booth #2 for leather coating with a hot air dryer.
- Unit 3 Brush finishing #1 for leather coating with a dryer.
- Unit 4 Brush finishing #2 for leather coating with a stick dryer.
- Unit 5 Hang Drying Room #1 (HDR)
- Unit 6 Hang Drying Room #2 (HDR)
- Unit 7 Hang Drying Room #3 (HDR)

Miscellaneous Emission Units Including Equipment Cleanup with Solvents

7.1.1 Description

The Permittee finishes leather (specialty and standard leather). After preliminary preparation for the finishing process, various types of coatings or finishes are applied depending upon the types of leather being produced. Coating operations include spraying, machine brushing and hand brushing of coatings unto leather. Drying techniques involve gas fired dryers, steam heated low heat dryers and hang drying rooms (hang drying rooms are also used for drying damp leather). Miscellaneous emission units which includes solvent cleanup is referenced here but the solvents may also be used on the equipment in Sections 7.2 and 7.3.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Spray Booth #1 with Hot Air Dryer #1 (SB-1, HAD1)	Leather Coating	Built in Water Curtain for the Spray Booth

Emission Unit	Description	Emission Control Equipment
Spray Booth #2 with Hot Air Dryer #2 (SB-2, HAD2)	Leather Coating	Built in Water Curtain for the Spray Booth
Brush Finishing #1 with Finish Dryer (BF1, FIRD)	Leather Coating	None
Brush Finishing #2 with Stick Dryer (BF-2, SD)	Leather Coating	None
Hang Drying Room #1 (HDR)	Drying of Damp Leather	None
Hang Drying Room #2 (HDR)	Drying of Damp Leather	None
Hang Drying Room #3 (HDR)	Drying of Damp Leather	None
	Miscellaneous Emission Units, Including Solvent Cleanup	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating operation" for the purpose of these unit specific conditions is a leather coating operation that includes the spray booths, brush finishing, dryers and hang drying rooms. As of the "date issued" as shown on page 1 of this permit, the affected coating operations are identified in Condition 7.1.2.
- b. The affected coating operation is subject to the limits identified in Condition 5.2.2 a and c.
- c. The spray booths in the affected coating operation at the source are subject to 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or

premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

- ii. The emissions of particulate matter into the atmosphere in any one hour period from the spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = *Process weight rate; and,
E = Allowable emission rate; and,

* For spray booths the process weight rate is the weight of the coating only.

- 1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

- iii. The brush finishing, hot air dryers, and hang drying rooms are not considered to be PM emitting units.
- d. The affected coating operation at the source is subject to 35 IAC 218.926(b)(2) for application of coatings to leather which provides that:
 - i. The VOM contained in stain coating, other than stain coatings applied to specialty

leather, as applied at the source in any consecutive 12 month period shall not exceed 10 tons.

- ii. For application of coatings to specialty leather, the total VOM content of all coatings, as applied to a category of specialty leather, shall not exceed 38 lbs per 1000 square feet of such specialty leather produced, determined on a monthly basis. The determination shall be made as follows:

$$C = E/A$$

Where:

C = The VOM contained in all coatings applied to a category of specialty leather in units of lbs/square feet;

E = The total VOM content of all coatings applied to the category of specialty leather during each month in units of lbs determined as the sum of the VOM content of each coating applied during the month to such leather;

A = The total area of the category of specialty leather produced in the month in units of square feet, determined as the sum of the area of each type of leather item produced during the month based on the number of such items produced and the area of such item.

- iii. For application of coatings to standard leather (non-stain operation), the VOM content of each coating shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating as applied.
- iv. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

- e. The specialty leather coating, stain coating to standard leather, and miscellaneous emission units which includes equipment cleanup with solvents at the source are subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from the individual units used for production of specialty leather and application of stain coating to standard leather. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

- f. The miscellaneous emission units, excluding equipment cleanup with solvents, qualifies for the provision in 35 IAC 218.920(d) which states that no limit under PP shall apply to emission units with emissions of VOM to the atmosphere to 10 ton per year if the total emissions from such emission units not complying with Section 218.926 does not exceed 5.0 tons per calendar year.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating operation for standard leather coating is not subject to 35 IAC 218.301, use of organic material, pursuant to 35 IAC 218.926 (b)(2)(C)(i), Exemption From General Rule on Use of Organic Material which excludes affected coating operation for standard leather from this requirement.
- b. The affected coating operation for stain coating to leather is not subject to 35 IAC 218.926(b)(2)(C) for application of coatings to leather, which excludes coatings complying with 35 IAC 218.926(b)(2) by means of Section 218.926(b)(2)(A). [See Condition 7.1.3(d)(i)]
- c. The affected coating operation for specialty leather coating is not subject to 35 IAC 218.926(b)(2)(C) for application of coatings to leather, which excludes coatings complying with 35 IAC 218.926(b)(2) by means of Section 218.926(b)(2)(B). [See Condition 7.1.3(d)(ii)]
- d. The cleanup solvent operations are not subject to the control requirements of 35 IAC 218.926

pursuant to the exemption in 35 IAC
218.920(b)(2)(B).

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide
emission limitations in Condition 5.5, the affected
coating operation is subject to the following:

None

7.1.7 Testing Requirements

Testing for VOM content of coatings shall be performed
as follows [35 IAC 218.105(a), 218.928, and Section
39.5(7)(b) of the Act]

- a. Upon reasonable request by the Illinois EPA, the
VOM content of specific coatings used in the
affected coating operation shall be determined
according to USEPA Reference Methods 24 and 24A
of 40 CFR 60 Appendix A and the procedures of 35
IAC 218.105(a).
 - i. The VOM content of representative coatings
"as applied" shall be determined according
to USEPA Reference Methods 24 and 24A of
40 CFR 60 Appendix A and the procedures of
35 IAC 218.105(a)
 - ii. This testing may be performed by the
supplier of a material provided that the
supplier provides appropriate
documentation for such testing to the
Permittee and the Permittee's records
pursuant to Condition 7.1.9(a) directly
reflect the application of such material
and separately account for any additions
of solvent [35 IAC 218.105(a)].
- b. If a request for testing has not been made, the
VOM content provided by the coating supplier may
be used, i.e. formulation data.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating operation to demonstrate compliance with Conditions 5.5.1 and 7.1.3 of this section, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. The name, identification number and type of each coating as applied in the affected leather coating operation;
 - ii. For specialty leather coating, records of the specialty leather produced;
 - iii. For specialty coatings, stains for specialty coatings, and standard leather coatings, the weight of VOM per volume and the volume of each coating as applied in the affected leather coating operation on a monthly basis;
 - iv. The production of specialty leather in square feet on a monthly basis, calculated as follows: Monthly number of sides produced multiplied by the square feet of leather per side (which is based on a rolling 5 year average production measured in square feet);
 - v. For the specialty leather coating and stain coating, a demonstration that the leather coating operation is complying with the requirement of specialty and stain coatings as required by Condition 7.1.3 (d)(i) and (ii) should be made. This should be accompanied by the calculations by which demonstration of compliance is made and should be kept on file at the source; and
 - vi. Total VOM emissions from the use of all coatings used in the affected leather coating operation in tons/month and tons/year. This shall be calculated using

the data from Condition 7.1.9 (a)(i) and (iii).

- b.
 - i. Name and identification of each material used in each miscellaneous emission unit and of each cleanup solvent used;
 - ii. VOM content of each material used in each miscellaneous emission unit and of each cleanup solvent used in weight percent;
 - iii. Amount of each material used in each miscellaneous emission unit and of each cleanup solvent used in and tons/year; and
 - iv. VOM emissions from the use of cleanup solvents in tons/year. This shall be calculated using the data from Condition 7.1.9 (b)(i),(ii) and (iii).
- c. Records of the testing of VOM and HAP content (wt. %) of each coating as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Pursuant to 35 IAC 218.991 (d)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3 (d) within 30 days following the occurrence of such violation.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected leather coating operation without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected leather coating operation remain in compliance.

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the work-practices inherent in operation of the affected leather coating operation.
- b. Compliance of coatings and miscellaneous emission units, including solvent cleanup with the VOM emission limitations shall be determined from the recordkeeping required by this section.
- c. See Condition 5.9.1 for emission calculation procedures.

7.2 Unit 8 - Pasting Room Dryer (PRD)

7.2.1 Description

The Permittee finishes leather. The pasting room dryer is a five zone drying oven used for drying wet sides of leather prior to finishing. Leather sides are pasted to solid 6 ft x 12 ft frames which hangs from a conveyor and slowly progresses through the five zones of the dryer. The leather leaving the pasting room dryer is typically hung in the hang drying rooms and subsequently sent to the leather finishing department. The hang drying rooms are also used to hang dry and cure leather which may be in various stages of production (See Condition 7.1.2). No PM is generated by the process.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Pasting Room Dryer (PRD)	Drying Wet Sides of Leather	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The pasting room dryer is subject to the limits identified in Conditions 5.2.2.a. and 5.2.2.c.
- b. The pasting room dryer at the source is subject to 35 IAC 218.301 which requires that: The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from the subject pasting room dryer. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.
- c. The pasting room dryer is subject to 35 IAC 218 Subpart PP. Pursuant to 35 IAC 218.920(d), no limits under Subpart PP shall apply to emission units with emissions of VOM less than or equal to 1.0 ton/yr if the total emissions from such emission units not complying with Section 218.926 do not exceed 5.0 tons per calendar year. The pasting room dryer is therefore exempt from the control requirements of 35 IAC 218.926. The

limit in 7.2.6 is therefore necessary to qualify for that exemption.

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected glue line is subject to the following:

VOM emissions from the pasting room dryer shall not exceed the following limits:

VOM Emissions
(T/Calendar Year)

0.25

The emission limits are based on the maximum VOM containing pasting material used and the maximum VOM content allowed. Compliance with annual limits shall be determined on a calendar year basis.

7.2.7 Operating Requirements

None

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the pasting room dryer to demonstrate compliance with Conditions 5.5.1, 7.2.3 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. i. The name and identification number of each VOM containing pasting material used;

- ii. The usage of each pasting material in units of tons/year;
- iii. VOM and HAP content of each pasting material in weight percent.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected pasting room dryer with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the limit in Condition 7.2.3(b) and (c) is assured based on the low annual emission rate allowed by Condition 7.2.6.
- b. See Condition 5.9.1(a) for emission calculation procedures.

7.3 Unit 9 - Cordovan Leather Processing (CDLP)

7.3.1 Description

The Permittee processes Cordovan leather. A VOM-containing solvent is utilized to prepare or "cut" anhydrous dyes which are machine brushed onto unprocessed leather horse hides. No top coats or other VOM-containing materials are utilized within Cordovan leather processing. The process does not emit PM. The process consists of a number of steps, each of which is considered as an emission unit although the entire process may be referred to as a unit.

7.3.2 List of Emission Unit and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Cordovan Leather Processing (CDLP)	Processing of Cordovan Leather	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected Cordovan leather process" for the purpose of these unit specific conditions is a process identified in Condition 7.3.2.
- b. The affected Cordovan leather process is subject to the limits in Condition 5.2.2(a) and 5.2.2(c).
- c. The affected Cordovan leather process is subject to 35 IAC 218 Subpart PP. Pursuant to 35 IAC 218.920(d), no limits under Subpart PP shall apply to emission units with emissions of VOM less than or equal to 1.0 ton/yr if the total emissions from such emission units not complying with Section 218.926 does not exceed 5.0 tons per calendar year. The Cordovan leather process, which consists of a number of emission units, is therefore exempt from the control requirements of Section 218.926. Condition 7.3.5 is necessary in order to qualify for that exemption.
- d. The affected Cordovan leather processing is subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from each emission unit of the subject leather processing. If no odor nuisance exists, the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

7.3.4 Non-Applicability or Regulations of Concern

N/A

7.3.5 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the Cordovan leather processing is subject to the following:

The VOM emissions from the Cordovan leather processing shall not exceed the following limits:

VOM Emissions
(Ton/Calendar Year)

3.0

The emission limits are based on the VOM usage and content of the solvent utilized.

Note that although the emissions are expressed as one limit, Cordovan Leather processing has a number of individual process steps and each is considered to be an emission unit. Thus emissions from any unit are under 1.0 ton/yr.

7.3.6 Operating Requirements

None

7.3.7 Inspection Requirements

None

7.3.8 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the Cordovan leather processing to demonstrate compliance with Conditions 5.5.1, 7.5.3 and 7.5.5 pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. The name and identification number of the VOM containing solvent used;
 - ii. The usage of solvent in units of tons/year; and
 - iii. Density and VOM content in weight percent of the solvent utilized.
- b. VOM emissions (ton/mo).

7.3.9 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the Cordovan leather process with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Exceedance of the limit in Condition 7.3.5.

7.3.10 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.11 Compliance Procedures

- a. If the annual emissions are less than the limit in Condition 7.3.5, compliance with Condition 7.3.3(c) and (d) can be assumed.
- b. See Condition 5.9.1 for emission calculation procedures.

- 7.4 Unit 10 - Buffer #1
Control - Baghouse (BH)

- Unit 11 - Buffer #2
Control - Whirl wet dust collector (WWDC)

- Unit 12 - Buffer #3
Control - Baghouse (BH)

- Unit 13 - Touch up Buffer #1
Control - Baghouse (BH)

- Unit 14 - Touch up Buffer #2
Control - Baghouse (BH)

7.4.1 Description

The Permittee finishes leather. The buffers are belt sanders for buffing leather. The two buffers #1 and #3 and the touch up buffers discharge through the same baghouse, and buffer #2 discharges through the whirl wet dust collector. These units only emit PM.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Buffer #1 (B1)	Buffing (Sanding) of Leather	Baghouse (BH)
Buffer #2 (B2)	Buffing (Sanding) of Leather	Whirl Wet Dust Collector (WWDC)
Buffer #3 (B3)	Buffing (Sanding) of Leather	Baghouse (BH)
Touch-Up Buffer #1 (TUB1)	Buffing (Sanding) of Leather	Baghouse (BH)
Touch-Up Buffer #2 (TUB2)	Buffing (Sanding) of Leather	Baghouse (BH)

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected buffer" for the purpose of these unit specific conditions is a buffer or a touch up buffer.

- b. The affected buffers are subject to the limits identified in Condition 5.2.2.a and 5.2.2.c.
- c. The affected buffers (B2 and B3) at the source are subject to 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected buffers (B2 and B3) shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

d. The affected buffer (B1) and the two touch up buffers (TUB1 and TUB2) at the source are subject to 35 IAC 212.322(a), which requires that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected buffer and touch up buffers shall not exceed the allowable emission rates specified in the following equation

$$E = C+A(P)^B$$

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

For process weight rates up to 27.2 MG/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534
C	0.0	0.0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.322].

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Control Requirements

- a. The Permittee shall operate, maintain, and replace the filters for the baghouse in a manner that assures compliance with the conditions of this section.
- b. An adequate inventory of spare filters shall be maintained.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected buffers are subject to the following:

There are no specific emission limitations for the buffers, however, there are source wide emission limitations in condition 5.5 that include these buffers.

7.4.7 Operating Requirements

None

7.4.8 Inspection Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items:

None

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected buffers with the permit requirements as follows,

pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

Exceedance of the regulatory requirements in Condition 7.4.3.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with Condition 7.4.3(c) and (d) in this section is assured and achieved by the proper operation and maintenance of the baghouse and whirl wet dust collector and the work practices inherent in operation of the affected buffers.

- 7.5 Unit 15 - Boiler #1 (UB1) - Natural Gas or fuel oil #6 Fired Boiler, with a maximum design heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr and constructed, modified or reconstructed before June 9, 1989.
- Unit 16 - Boiler #2 (UB2) - Natural gas or fuel oil #6 Fired Boiler, with a maximum design heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr and constructed, modified or reconstructed before June 9, 1989
- Unit 17 - Kemco Water Heater (KWH) - Natural Gas Fired Boiler, with a maximum design heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr and constructed, modified or reconstructed after June 9, 1989.
- Unit 18 - Three natural gas fired units, each with maximum design heat input capacities of 20 mmBtu/hr or less, but greater than or equal to 0.3 mmBtu/hr and constructed, modified or reconstructed before June 9, 1989.

7.5.1 Description

Natural gas or fuel oil #6 fired boilers are used to produce steam for heat generation at the source. Natural gas fired Kemco water heater is used to heat water. The three natural gas fired dryers are used to dry leather.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boiler #1 (UB1)	Natural Gas or Fuel Oil #6 Fired Boiler Rated at 19 mmBtu/hr Firing Rate, and Constructed Prior to June 9, 1989.	None
Boiler #2 (UB2)	Natural Gas or Fuel Oil #6 Fired Boiler Rated at 19 mmBtu/hr Firing Rate, and Constructed Prior to June 9, 1989.	None

Emission Unit	Description	Emission Control Equipment
Water Heater (KWH)	Natural Gas Fired Heater Rated at 17.5 mmBtu/hr Firing Rate, and Constructed after June 9, 1989	None
Three Natural Gas Fired Dryers (HAP2, PRD, FIRD)	Three Natural gas fired units rated at 2.0 mmBtu/hr, 5 mmBtu/hr and 1 mmBtu/hr, respectively and constructed prior to June 9, 1989.	None

7.5.3 Applicable Provisions and Regulations

- a. An affected boiler for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas or fuel oil #6 with a maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr. Boilers (UB1 and UB2) were constructed prior to June 9, 1989, hence they are not subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc. As of the "date issued" as shown page 1 of this permit, the affected boilers are identified in Condition 7.4.2.
- b. An affected "water heater" for the purpose of this unit specific conditions is a fuel combustion unit fired with natural gas with a maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr. The water heater (KWH) was constructed after June 9, 1989. As a consequence, because the water heater was constructed after June 9, 1989 and the firing rate of the affected water heater is less than 100 mmBtu/hr, the affected water heater is potentially subject to the Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart Dc. But, no substantive standards in 40 CFR 60, Subpart Dc apply to natural gas-fired units. The unit is subject to notification requirements in Condition 7.5.10.
- c. The affected dryers for the purpose of these affected unit specific conditions are existing

fuel combustion units fired with natural gas, each with maximum heat input capacities of 10 mmBtu/hr or less, but greater than or equal to 0.3 mmBtu/hr.

- d. The affected boilers, water heater, and dryer are subject to the limits identified in Conditions 5.2.2.a and 5.2.2.c.
- e. The emission of carbon monoxide (CO) into the atmosphere from the affected boilers and water heater with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- f. For the affected boilers when using fuel oil #6, the emissions of sulfur dioxide shall not exceed 1.0 lb/mmBtu of actual heat input [35 IAC 214.161].
- g. For the affected boilers when using fuel oil #6, the emissions of particulate matter shall not exceed 0.1 lbs/mmBtu of actual heat input [35 IAC 212.206].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected boilers, water heater, and dryers are not subject to 35 IAC 217.141, because the actual heat input of each the affected boilers, water heater, and dryers is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 218.303, the affected boilers, water heater, and dryers, i.e., fuel combustion emission units, are not subject to 35 IAC 218.301, Use of Organic Material.
- c. There are no applicable requirements for particulate matter or sulfur dioxide for the boilers, water heater, or dryers when firing natural gas.
- d. The New Source Performance Standards 40 CFR 60, Subpart Dc are not applicable to the boilers (UB1 and UB2), nor to the dryers, as the boilers and dryers were constructed prior to June 9, 1989. As well, 40 CFR 60, Subpart Dc is not applicable to the Kemco water heater, as no substantive standards of this regulation apply to the

affected natural gas fired heater, but records are required to verify that only natural gas was used as the fuel.

- e. The affected dryers are not subject to 35 IAC 216.121 because the actual heat input of each of the affected dryers is less than 2.9 MW (10 mmBtu/hr).

7.5.5 Operational and Production Limits and Work Practices

- a. i. Natural gas or fuel oil #6 shall be the only fuel burned in the affected boilers.
 - A. The Permittee shall not use residual fuel oil (Grade No. 6 fuel) in the affected boilers with a sulfur content greater than that given by the formula below:

$$\text{Maximum wt.\% sulfur} = (0.00005) \times (\text{gross heating value of oil in Btu/lb})$$

- b. Natural gas shall be the only fuel burned in the affected water heater and dryers.
- c. The natural gas consumption for the affected units at this facility combined shall not exceed the following limits:

Natural Gas Consumption
(mcf/yr)

175

These limitations are set for the purpose of establishing emissions for fees based on the maximum fuel usage and are not federally enforceable.

- d. The fuel oil #6 consumption for affected boilers shall not exceed the following limits:

Fuel Oil #6 Consumption
(Gal/yr)

50,000

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

There are no specific emission limitations for the boilers, however, there are source wide emission limitations in Condition 5.5 that include this boiler.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.3 and 7.4.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Records showing that only natural gas was fired in the water heater (KWH).
- b. Total natural gas usage for the source in mcf/year.
- c. Annual aggregate NO_x, PM, SO₂, and VOM emissions for the source based on fuel consumption and the applicable emission factors, with supporting calculations.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable control and operating requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

If the water heater (KWH) is reconstructed or an operational change made that would increase the emission rate to which a standard would apply, pursuant to 40 CFR 60.7.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with Condition 7.5.3 is demonstrated under inherent operating conditions of the affected boilers, water heater, and dryers so that no compliance procedures are set in this permit addressing this requirement. See Condition 5.9.1 for emission calculation procedures.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after May 12, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification

may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit, if applicable, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located

or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports

required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the 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 [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DGP:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Horween Leather Company is located at 2015 North Elston Avenue, Chicago in Cook County. The source processes and finishes leather. Horse hides received are processed through Cordovan Leather Processing into specialty leathers. Cattle hides received at the source are produced into specialty leather and standard leather. All cattle hides are washed, limed, de-haired, and chrome tanned to remove naturally occurring oils which must be replaced. Oils are replaced by fat liquoring or hot stuffing. Leather is then dried, and may undergo buffing, staking, and splitting to prepare it for finishing. In the cattle leather finishing process, various types of leather coatings, or finishes are applied depending upon the type of leather being produced. Coating operation include spraying, machine brushing and hand brushing of coatings onto leather. Drying techniques involve gas fired low heat dryers, steam heated low heat dryers, and hang drying rooms.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Spray Booth #1 (SB-1)	Leather Coating Booth	1989/90	Built in Water Curtain
Hot Air Dryer #1 (HAD1)	Drying of Coated Leather	1964	None
Spray Booth #2 (SB-2)	Leather Coating Booth	Early 1980's	Built in Water Curtain
Hot Air Dryer #2 (HAD2)	Drying of Coated Leather	Early 1980's	None
Brush Finishing #1 (BF1)	Leather Coating	1958	None
Finish Dryer (FIRD)	Drying of Coated Leather	1965	None
Brush Finishing #2 (BF2)	Leather Coating	Pre 1954	None
Stick Dryer	Drying of Coated Leather	Pre 1954	None
Hang Drying Room #1 (HDR)	Drying of Damp Leather	Pre 1959	None
Hang Drying Room #2 (HDR)	Drying of Damp Leather	Pre 1959	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Hang Drying Room #3 (HDR)	Drying of Damp Leather	Pre 1959	None
Pasting Room Dryer (PRD)	Drying Wet Sides of Leather	1975	None
Cordovan Leather Process (CDLP)	Cordovan Leather Processing	1930	None
Buffer #1 (B1)	Sanding of Leather	1960	Baghouse (BH)
Buffer #2 (B2)	Sanding of Leather	1980	Whirl-Wet Dust Collector (WWDC)
Buffer #3 (B3)	Sanding of Leather	1993	Baghouse (BH)
Touch-up Buffer #1 (TUB1)	Touch-up Sanding of Leather	1954	Baghouse (BH)
Touch-up Buffer #2 (TUB2)	Touch-up Sanding of Leather	1954	Baghouse (BH)
Union Boiler #1 (UB1)	19 mmBtu/hr Gas/Oil Fired Boiler	Pre 1967	None
Union Boiler #2 (UB2)	19 mmBtu/hr Gas/Oil Fired Boiler	Pre 1967	None
Kemco Water Heater (KWH)	17.5 mmBtu/hr Gas Fired Water heater	September, 1989	None
Three Natural Gas Fired Dryers (HAD2, PRD, FIRD)	Three Natural Gas Fired Units Rated at 2.0 mmBtu/hr, 5 mmBtu/hr, and 1 mmBtu/hr, respectively.	Prior to June 9, 1989	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source for fee purposes. Emissions from insignificant activities at this source are not accounted for in this limit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	100.82
Sulfur Dioxide (SO ₂)	3.58
Particulate Matter (PM)	10.62
Nitrogen Oxides (NO _x)	13.63
HAP, not included in VOM or PM	0.00
TOTAL	128.65

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emission reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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