

Project Summary

I. INTRODUCTION

This source has applied for a renewal of its Clean Air Act Permit Program (CAAPP) operating permit. 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.

This permit was previously sent to Public Notice in August 2004 but is being renoticed due to a change in status with regard to hazardous air pollutants (HAPs). The original permit (issued in December 1999) and the original notice for this renewal stated that the source was a major source of HAPs. Due to the removal of one material from the list of HAPs, this source is no longer a major source of HAPs by a wide margin. However, since the applicability of the requirement to comply with a NESHAP is being deleted, the permit must undergo another public notice. If the one HAP had not been delisted, the source planned to comply by minimizing the HAP content of the materials unused. The primary difference is that now records are not required to demonstrate compliance with a standard, but records are required to demonstrate that the source is not major for HAPs.

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

Emission Unit	Description	Date Constructed	Emission Control Equipment
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
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-Fired Boiler	Pre 1967	None
Union Boiler #2 (UB2)	19 mmBtu/hr Gas-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)	99.11
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	126.94

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. Subpart TTTT applies to this source.

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 166.

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