

The cleaning of all spray guns and spray gun components shall consist of soaking these items in closed containers of cleaning solvents. Under no circumstance shall VOC containing solvents be sprayed into the atmosphere. All containers of VOC containing adhesives, mat coating materials, and cleaning solvents shall be kept closed except when transferring material into or out of the containers.

The permit contains potential to emit VOC limits of three (3) pounds per hour, 15 pounds per day or 2.7 tons per year, for the air stripper, and the Continental boiler. A detailed RACT analysis which meets the criteria specified in 25 Pa. Code Chapter 129 section 129.92, must be submitted to PADEP for each source if any of these limits are exceeded. In addition, the Continental boiler is to be fired on gas (natural or LP) or No. 2 fuel oil, to which there had been no reclaimed, waste oil or other waste material added. The facility shall, upon request by PADEP, provide fuel analyses, or fuel samples, of the fuel used in the boiler.

Resilite is required to maintain copies of manufacturer's formulation or composition data sheets for all adhesives, mat coating materials, cleaning solvents, and other VOC-containing materials used within the previous two years and shall make this if available to PADEP. These data sheets are to contain all of the information needed to determine compliance with the VOC emission limits. Resilite is also required to maintain a mat reconditioning/cleanup solvent log in which the following data are recorded: (a) Identification, quantities and dates of use of all VOC-containing solvents used for mat reconditioning; (b) identification, quantities and dates of all VOC-containing solvents used for cleanup of spray guns and spray gun components; (c) identification, quantities and dates of all VOC-containing solvents used for cleanup purposes other than mat reconditioning and spray gun cleanup; and (d) quantities and dates of shipment for all spent mat reconditioning solvent and cleanup solvent shipped offsite for disposal or recycle. This information is to be retained for at least two years and made available to PADEP upon request.

Resilite shall implement the "Employee Training Program" and "Leak Detection and Maintenance Program" for all new and existing Resilite employees involved in adhesive application, mat coating material application, mat reconditioning and spray equipment cleanup activities. This training will also address the requirements of this permit as well as

the requirements of any applicable state and federal regulations.

The permit contains recordkeeping requirements pursuant to 25 Pa. Code Chapter 129 section 129.95. Resilite shall keep accurate, comprehensive records sufficient to demonstrate compliance with the RACT requirements specified in this permit and shall, at a minimum, include the following: (a) Identity and amount of each adhesive used per month as well as identify and amount of any thinner added to the adhesive, (b) the mix ratio (gallons of thinner per gallon of adhesive) for each batch of adhesive used to which the thinner was added, (c) identity and amount of mat coating material used per month as well as the identity and amount of any thinner added to the mat coating material, (d) the mix ratio (gallons of thinner per gallon of coating material) for each batch of coating material used to which the thinner was added, and (e) gallons of groundwater processed through the air stripper per year as well as the VOC concentration in the influent to the air stripper, that is determined at least once per calendar quarter.

E. Westfield Tanning Company

Westfield Tanning Company is a leather manufacturing facility located in Tioga County, Pennsylvania and is considered a major source of VOC. In this instance, RACT has been established and imposed by PADEP in an operating permit. On February 4, 2003, PADEP submitted operating permit No. OP-59-0008 to EPA as a SIP revision. This permit requires Westfield Tanning Company and any associated air cleaning devices to be operated and maintained in a manner consistent with good operating and maintenance practices. The permit incorporates RACT determinations as required by the provisions of Title I of the CAA and 25 Pa. Code Chapter 129 sections 129.91 through 129.95 for the following sources: (1) Leather tanning operation consisting of the following: (a) tanning solutions prep room, (b) tanning solutions storage tank, and (c) tanning vats; (2) leather waterproofing operations consisting of the following: (a) four 165 gallon custom designed leather dip tanks (Tanks 1-4), (b) one 135 gallon custom designed leather dip tank (Tank 5), (c) one 475 gallon custom designed leather dip tank (Tank 6), and (d) one leather drying room; (3) two 750 horsepower natural gas/No. 2 fuel oil fired Johnson boilers; (4) three Safety Kleen degreasing sinks; (5) a gasoline storage consisting of a 250 gallon capacity horizontal gasoline storage vessel; (6) kerosene cleaning of the

leather splitting blades; and (7) sponge solution fungicide leather treatment.

The permit contains a maximum VOC emission limit from the leather tanning operation of 11.4 tons in any 12 consecutive month period. The facility shall provide training to all employees involved in handling of VOC-containing materials associated with the leather tanning operation. The training shall, at a minimum, address the topics of VOC emission minimization techniques and good housekeeping practices. The facility is required to maintain comprehensive, accurate records for the leather tanning operation in accordance with 25 Pa. Code Chapter 129 section 129.95 which, at a minimum, shall include monthly usage records for all VOC-containing materials associated with the tanning operation. These records shall be retained for a minimum of two years and made available to PADEP upon request.

The leather waterproofing operation requirements in the permit are pursuant to the RACT provisions of 25 Pa. Code Chapter 129 sections 129.91 through 129.95, and the Best Available Control Technology provisions of 25 Pa. Code Chapter 127 sections 127.1 and 127.12. The permit contains a maximum VOC emissions limit from the leather waterproofing operation of 55 tons in any 12 consecutive month period. All materials added to each waterproofing dip tank shall contain, in aggregate, no more than 5.5 pounds of VOC per gallon. Compliance is determined based on a quarterly average VOC content to be calculated based on all material additions to each tank in a given calendar quarter. All dip tanks shall be kept closed when not in actual use. The facility shall provide training to all employees involved in the waterproofing operation. The training shall, at a minimum, address the topics of VOC emission minimization techniques and good housekeeping practices. In addition, the wetting of cleaning rags associated with the waterproofing operation shall be done using a closed top cleanup solvent plunger cans and no waste cleanup solvents, either in bulk or remaining in used remaining in used cleanup rags, shall be disposed of through evaporation.

The facility shall maintain comprehensive, accurate records for the leather waterproofing tanning operation in accordance with 25 Pa. Code Chapter 129 section 129.95 and the Best Available Technology provisions of 25 Pa. Code Chapter 127 sections 127.1 and 127.12 which, at a minimum, shall include the following with respect to each waterproofing dip tank